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ABSTRACT

This report contains recommendations for changes to New York's Tuition Assistance Program (TAP) to be considered during the 1997 legislative session. It outlines the principal options addressed by the task force, the historical context of the TAP, and the cost of meeting full tuition and non-tuition allowances through state and federal grants and the expected family contribution. The task force recommended changes that would simplify for students and families the entire process of applying for and of determining TAP awards. It recommended that the separate TAP application form should be eliminated; the method of calculating TAP should be simplified and, while maintaining net taxable income as the base, should allow for use of federal data elements; the federal and state criteria for determining financial independence should be reconciled; the award schedules for determining TAP awards should be consolidated; and future increases in TAP funding should be used first to restore TAP schedules to 1990 levels. Appendixes provide TAP task force costings and a discussion of the policy issues involved in reforming TAP. (MDM)

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Report of the Temporary Task Force on the Tuition Assistance Program

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December 15, 1996

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REPORT OF THE TEMPORARY TASK FORCE
ON THE
TUITION ASSISTANCE PROGRAM (TAP)

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NEW YORK STATE
HIGHER EDUCATION SERVICES CORPORATION
99 WASHINGTON AVENUE
ALBANY, NEW YORK 12255

GEORGE E. PATAKI
GOVERNOR

ROBERT J. MAURER
PRESIDENT

December 15, 1996

Honorable James G. Natoli
Director of State Operations
State Capitol
Executive Chamber, Room 229
Albany, New York 12224

Mr. Charles H. Foster
Assistant Chief Budget Examiner
Division of the Budget
State Capitol, Room 140
Albany, New York 12224

Dear Messrs. Natoli and Foster:

I am pleased to transmit the Report of the Temporary Task Force on the Tuition Assistance Program.

This Report contains recommendations for changes to the Tuition Assistance Program to be considered during the 1997 Legislative Session for implementation in the 1998-99 academic year.

My fellow members and I thank you for the opportunity to serve on the Task Force and we hope that our Report provides useful advice.

Sincerely,

Dr. Matthew Schure
Chairman,
Temporary Task Force on the
Tuition Assistance Program

TAP TEMPORARY TASK FORCE
MEMBERS

Dr. Matthew Schure, N.Y. Institute of Technology, Chairman

Ms. Michelle Brown-Nevers, NYS Organization of Bursars and Business Administrators

Mr. David Canaski, Bryant & Stratton Business Institute

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(Continued)

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Dr. W. Ann Reynolds, Chancellor, City University of New York

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Ms. Jeremy Weis, State Education Department

Ms. Lucy Wiertel, NYS Organization of Bursars and Business Administrators

I. Executive Summary

The Temporary Task Force on the Tuition Assistance Program (TAP) was formed in the Fall of 1996 at the request of the Governor's Office of State Operations and the Division of the Budget. In summary, the charge to the Task Force was to review the federal needs analysis system for possible use by the State, coordination of State grants with federal programs, and the use of tuition and non-tuition costs in determining TAP awards. The Task Force's charge stated that its recommendations were not to significantly increase, decrease, or redistribute TAP expenditures for students or for sectors of high education. A variety of alternatives were considered.

In concluding its work, the Task Force recommended changes which would simplify for students and families the entire process of applying for and of determining TAP awards. The Task Force recommends:

(1) The separate TAP application form should be eliminated. Students and families should be able to apply for TAP when they complete a Free Application for Federal Student Aid (FAFSA).

(2) The method of calculating TAP should be simplified and while maintaining net taxable income as the base should allow for use of federal data elements. The Task Force recognized that the continued use of New York State net taxable income is the only means to avoid significant shifts in how TAP expenditures are distributed by student, by school, and by sector. Income reported on the FAFSA less New York State standard deduction and exemptions would be used to estimate initial awards. Those who itemize deductions or who have other subtractions would be allowed to report actual New York State net taxable income which would be used to determine their TAP award. The use of federal data elements to determine New York State net taxable income maintains the basis for determining TAP eligibility and at the same time allows for elimination of a separate TAP form.

(3) The federal and State criteria for determining financial independence should be reconciled. The different criteria between federal and State programs results in what students perceive as inequitable treatment or bureaucratic confusion. The Task Force recommends that the criteria for federal programs be adopted for the TAP program.

(4) The award schedules for determining TAP awards should be consolidated. Currently, there are thirteen different TAP schedules used to calculate awards. There are different schedules for students depending upon the first year in which they received TAP, whether the student is independent or dependent, an undergraduate or graduate. The Task Force recommends that the schedules be reduced to four undergraduate schedules and two graduate schedules.

(5) Future increases in TAP funding should be used first to restore TAP to 1990 levels. Legislation enacted in 1988 provided for phase-in of increases in TAP through the 1993-94 school year. These increases have never been fully implemented. The Task Force recommends that, to the extent that additional funding for TAP is considered, the funds be used to restore the provisions that applied to TAP before the first reductions enacted in 1990, including restoring the maximum award amounts and coverage of full tuition at public institutions.

II. The Temporary Task Force on the Tuition Assistance Program (TAP)

During discussions relating to the State budget in Spring 1996, the question of restructuring TAP was raised. Time did not allow for a full examination of the issue in the context of enacting the 1996-97 State budget.

In Fall 1996, the Governor's Office of State Operations and the Division of the Budget requested that the Higher Education Services Corporation host a temporary Task Force to study and make recommendations to the Governor on revisions to the Tuition Assistance Program. The Task Force was to report not later than December 15, 1996, so that its recommendations could be considered during the 1997 legislative session for implementation for the academic year beginning July 1, 1998.

The charge to the TAP Task Force was as follows:

> In developing its recommendations for the implementation of a needs analysis system for student financial aid, the Task Force shall address the following: (a) comparison of the federal needs analysis system to the existing Tuition Assistance Program need determination process; (b) coordination of the New York State programs with the federal student financial aid programs; (c) the use of the federal expected family contribution as calculated by the federal needs analysis processor in accord with the formula established in the Higher Education Act of 1965 in the determination of TAP eligibility; (d) the need for adjustments to the expected family contribution reflecting the special needs of New York State students and parents; (e) the use of tuition and non-tuition costs of attendance in determining TAP awards; and (f) other related issues raised by task force members.

The Task Force examined each of the items in the charge with emphasis on the means of determining the need of students for financial aid. During this examination the Task Force as directed by its charge sought to develop recommendations that would not significantly increase, decrease, or redistribute TAP expenditures for students or for sectors of higher education. The charge was formidable and this report reflects the

ceaselessly difficult task of reconciling the State's goal of ensuring student access and choice in higher education with the fiscal reality that resources are not available to meet all needs without considering student and family resources, federal grants, campus aid, and loans. As described in this report, one such effort to reconcile these contentions would cost an estimated $2.2 billion in the context of present day formulas used in the allocating of financial aid. A cost no state could afford.

The report deals with the major issues of access, choice, and State finances and suggests further work is needed over a longer time frame to fashion a program that addresses basic principles of student aid including the student and family role, the federal contribution, institutional aid, and determining New York's contribution. At the same time, the Task Force recommends steps that should be taken immediately to simplify the processes for applying and determining State awards and to maintain a level of tuition assistance for students equivalent to that currently available through the Tuition Assistance Program (TAP).

III. Principal Options Addressed by the Task Force

The Task Force concluded that they would look at two principal options in preparing its report:

1. Continuing Use of New York State Net Taxable Income

This option would keep the current basis for TAP as is with allowance for changes in administrative processes to simplify the application process and determination of awards. One such administrative change would be to use federal data elements from the Free Application For Federal Student Aid (FAFSA) to generate a supplemental application form for all students to collect changes to net taxable income and parents' signatures. The use of a supplemental application form would eliminate the current separate TAP application and would allow a student and family to apply using only the federal FAFSA. However, all students would need to return the supplemental form with changes, if any, in order to receive TAP.

2. Use of Federal Data Elements in the TAP Program

The Task Force discussed three approaches for use of federal data elements:

A. Use of the federal data elements as reported on the FAFSA with modifications to reflect New York State issues. Three methods for doing this were discussed:

(1) Income reported on the Free Application for Federal Student Aid (FAFSA) less New York State standard deductions and exemptions.

(2) Income reported on the FAFSA less New York State standard deduction and exemptions would be used to estimate initial awards. Those who itemize deductions or who have other subtractions would be allowed to report actual New York State net taxable income which would be used to determine their TAP award.

(3) Using income reported on the FAFSA in lieu of New York State net taxable income in TAP schedules. However, the TAP schedules would need to be rewritten to approximate the same TAP awards as students currently receive using net taxable

income.

B. Use of the federally determined Expected Family Contribution (EFC) in conjunction with a cost of attendance adjusted for New York State program purposes. Two approaches for the use of EFC that were discussed were:

(1) Substituting EFC for New York State net taxable income in the current TAP schedules.

(2) Use of a modified EFC to reflect New York State concerns. The EFC could be modified to reflect the following:

(a) The EFC could be increased or decreased to meet New York State concerns, e.g., Michigan inflates the federal EFC by 25% in order to stay within its appropriated funds.

(b) Some items that are included in the determination of the federal EFC might not be used in the New York State version to reflect New York State concerns in some areas. E.g., social security benefits for students and parents, public pension retirement income included in gross income, the receipt of AFDC or ADC public assistance benefits.

(c) Cost of Attendance - The Task Force discussed use of cost of attendance with federal data elements to determine TAP awards. The decision was to look at the effect of using the housing status as reported on the FAFSA to determine whether or not a student was a commuter student living at home, a commuter student not living at home, or a resident student. Also, the dependency status of the student would be taken into consideration. Cost of attendance would be determined for the following categories of students:

(1) Dependent student living at home

and

(2) All other students.

The following costs of attendance were used in estimating the cost of this option and do not reflect actual costs which vary by student, by institution and by community. The room and board allowances are those provided as a minimum for federal Title IV student financial aid programs. The books, supplies, and transportation allowances were estimated to arrive at a distribution of TAP funds similar to that of the current TAP program.

(1) Average tuition and fees for each sector.

(2) Room and Board - $1,500 for dependent students living at home and $5,000 for all others.

(3) Books and supplies allowance - $600

(4) Transportation Allowance - $400

IV. Historical Context

The Temporary Task Force on the Tuition Assistance Program, while adopting rigid constraints in making its recommendations for action during the 1997 Legislative session, wishes to express certain concepts to be considered in the further development of New York State's student financial aid programs. The history of higher education finance and governance in New York State has been shaped in large part by an important series of task force reports. These include the Heald Report of 1960, the Bundy Report of 1968, and the Keppel Report of 1973.

The Heald Report, titled "Meeting the Demand for Higher Education in New York State," led to the rapid and vast expansion of the State University of New York and public higher education in the City of New York, and additional support for independent institutions. The Bundy Report, issued in 1968, resulted in the landmark program of direct State support to independent institutions based on the number and level of degrees awarded. The Keppel Report was issued in 1973 and made recommendations on a wide area of higher education finance and governance issues. The Keppel Report included a strong focus on expanding student aid rather than institutional aid. The Tuition Assistance Program (TAP) was enacted in 1974 as a result of the significant attention that was drawn to the desirability of establishing a program through which substantial funding allocation decisions were made by students. Each of these reports changed the landscape of higher education in New York State. Although not all of the recommendations of the reports were enacted in the form of the original proposals, the real importance of these reports was to draw attention to particular issues that needed to be addressed. In the area of student financial aid, the Keppel Report is most noteworthy. The "Student Bill of Rights" (Appendix F) included principles or hopes that are equally valid today and some of which still form the basis for discussion of student financial aid at both the national and State levels. These included:

1. Students from low-income families should receive support in the form of grants with loans and work available to cover all reasonable actual expenses for tuition, fees, books, room and board, commuting costs and an allowance for personal expenses at public and private post-secondary institutions.

2. Students from families whose income level makes them ineligible for grants should be eligible to receive support from subsidized student loans and work. The level of this

support, however, is contingent on the family's ability to pay, diminishing to zero at the point where the family can defray a student's entire educational expenses.

3. Families should be guaranteed loans without subsidized interest in order to finance part of the required level of support.

While the TAP Program did not take the shape of the "Student Bill of Rights" that was outlined in the Report some of the elements of the Bill of Rights have been reflected in financial aid programs developed over the past two decades.

First, the federal Pell Grant Program has evolved into a significant, but insufficient source of funding for students. Recently the Pell award levels have increased at amounts unparalled since the early days of the Program. The awards for 1997-98 should bring total Pell funding for New York up to the level of funding for the TAP program for degree granting institutions. However, increases in the Pell award have not kept pace with the cost of attendance and the program is not even funded at its authorized amount.

Second, a widespread method for determining the financial strength of families has been developed. The Expected Family Contribution (EFC) formula now contained in federal law has become the single system used to determine eligibility for all federal student financial aid programs. In addition, the EFC is used in some form for almost all state student financial aid programs and to administer large amounts of institutional aid. However, there are concerns that the EFC concept no longer represents an objective measure of the ability of families to pay for college expenses and has become a rationing device to allocate scarce funds. The Congressional Committee currently working on the Reauthorization of the Higher Education Act plans to address this issue. The Expected Family Contribution, for all its limitations, is currently used for awarding the vast majority of student financial aid, and the formula can be modified to suit the needs of individual states and institutions.

Third, loans have become the primary source of funding for higher education expenses, and parents can now borrow up to the full cost of tuition and non-tuition expenses minus financial aid. As of 1994-95, students who attended college for four years, had an average indebtedness of $8,500 for CUNY students, $10,300 for SUNY students and $13,500 for independent college students. The United States Census Bureau continues to estimate that a college degree is worth $500,000 to $750,000 more in earnings over a working lifetime than earnings for those who have

no college exposure. So, these loan amounts, for students who complete their program and obtain reasonable employment, can, with the many flexible repayment options, be paid back over a 10 to 25 year period. However, increased student indebtedness is a continuing concern for students, families and financial aid professionals. This is of particular concern for students who do not complete a program of study.

A number of the desired funding levels for students in the Keppel Report Bill of Rights are expressed as proportions of expenses. For example--for low income students, "Outright grants should cover approximately two-thirds of actual reasonable costs during the first two years at all institutions." This means that students attending higher-cost institutions should receive significantly more funding than students attending low-cost institutions. Indeed, when the TAP Program was enacted in 1974, students at SUNY received a maximum TAP grant of $750, and students at independent colleges received a maximum of $1,500.

In July 1996, CUNY provided comments on a proposal to restructure TAP and commented on the issue of reducing tuition differentials and proportional funding as a means of assuring college choice. (See Appendix E) The CUNY comments on tuition differentials focus on a "tuition equalization amount" which is defined as the amount by which the maximum TAP award at an independent institution exceeds the maximum TAP award at SUNY. These comments discuss various approaches to determining a tuition equalization amount including raising the TAP maximum award or equating it to a percentage of the full cost of attendance.

The maximum TAP award has ranged from the current low of 24 percent of SUNY tuition to a high of 162 percent of SUNY tuition. The most frequent tuition percentage observed was 100 percent. This perspective would suggest a TAP maximum award of $5,000.

The combination of EFC and TAP and Pell awards is shown in Charts 1, 2, and 3. From a public policy perspective, review of the charts demonstrates a substantial variance between public college TAP eligible students and independent college TAP eligible students. In one case, a low-income student gets a TAP grant and a Pell grant covering 100 percent of tuition and an almost 40 percent additional amount for non-tuition costs of attendance at the public college. In the other case, a similar low-income student gets a TAP award and a Pell grant but still has an $8,000 cost of tuition and no funding other than loans or campus-based aid to cover the remaining tuition and other costs of attendance.

Positive signs for closing the gap are appearing at the federal level. The increase in the maximum Pell award will be $230 bringing to $2,700 the annual maximum for the 1997-98 academic year. The President has proposed a $1,500 Hope Scholarship to cover basic costs for the first two years of college and a $10,000 tax deduction for tuition expenses.

Building on the history of the development of TAP, we can develop a set of concepts to help shape future deliberations on TAP. Although our current recommendations are constrained to current spending levels and sector distribution of funding, policy forumlation should always strive to meet an ideal, even if progress toward that ideal must be deferred because of funding or other considerations.

Concepts in one model of a New York State financial aid Program might include:

1. Students and families have a responsibility to the extent of their resources to provide for the cost of postsecondary education.

2. Awards should be based on tuition as well as non-tuition costs.

3. New York State should establish a New York State Expected Family Contribution calculation to determine eligibility for State awards.

4. State grants should be coordinated with federal grants and other major sources of financial aid including possible new tax benefits, with the total not to exceed the actual institutional cost of attendance.

5. The maximum State grant at independent and degree granting proprietary institutions should be twice the maximum grant at public institutions, thus restoring the original TAP ratio. State grants at public institutional should cover full tuition.

6. State grants should be a larger portion of the financial aid package for lower-division students in order to reflect priority on access and to decrease student use of loans in the early years.

7. The total of grants, loans and work funding available should supplement the expected family contribution and be sufficient to cover the full costs of public or independent college.

8. Families should have access to unsubsidized loans in order to finance the expected family contribution.

Chart 1
Comparison of Awards and Expected Family Contribution (EFC) at Various Income Levels
CUNY

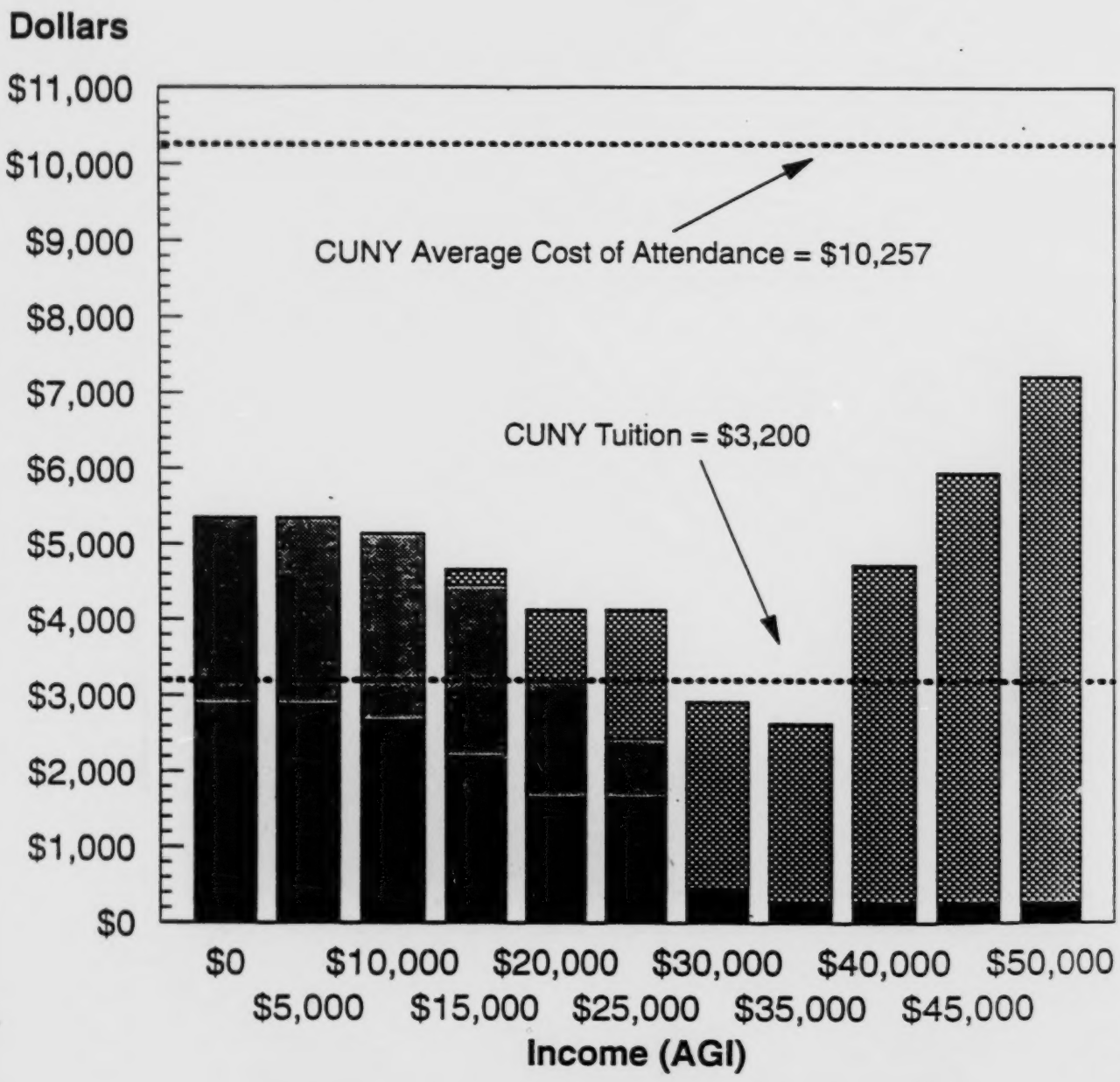


Chart 2
Comparison of Awards and Expected Family Contribution (EFC) at Various Income Levels
SUNY

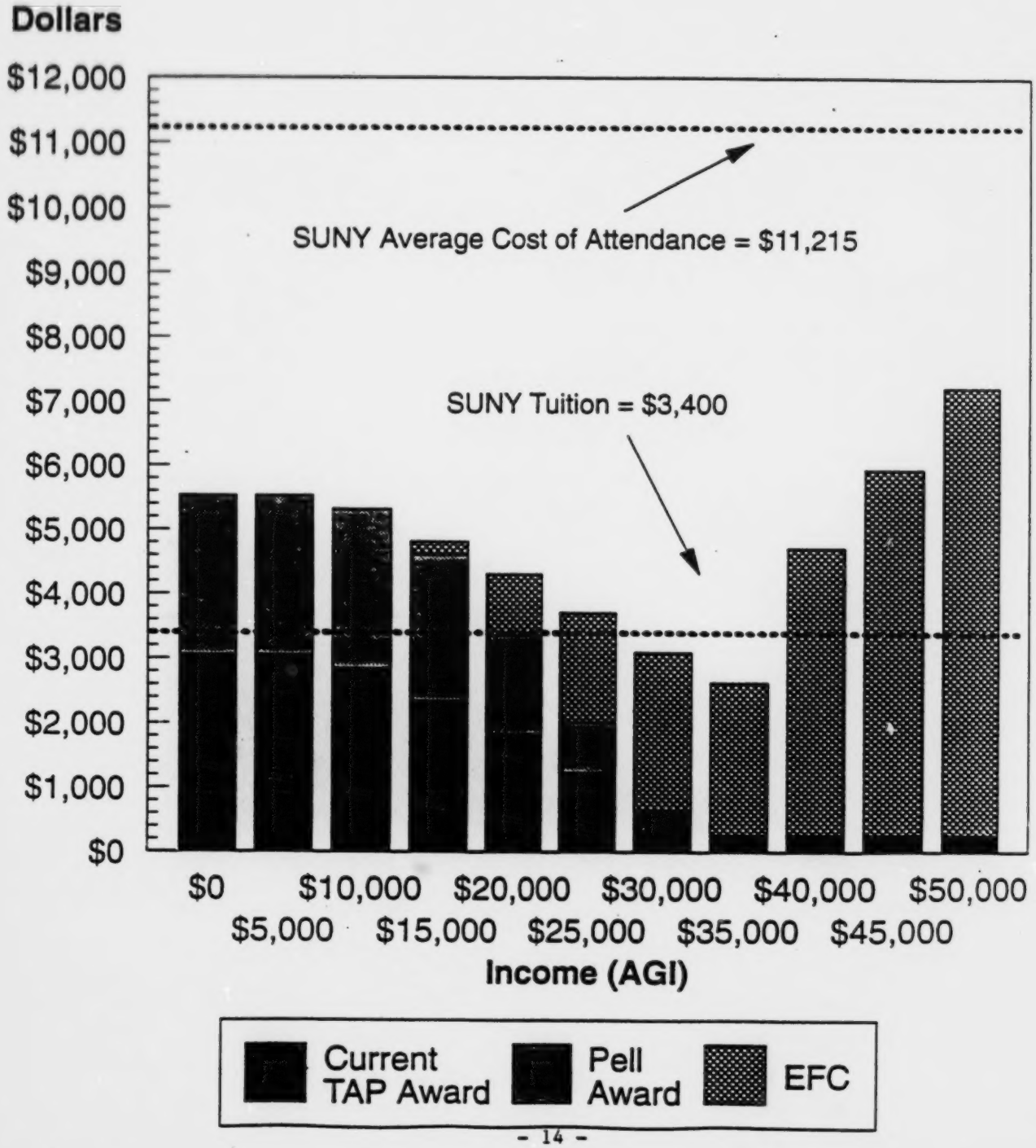
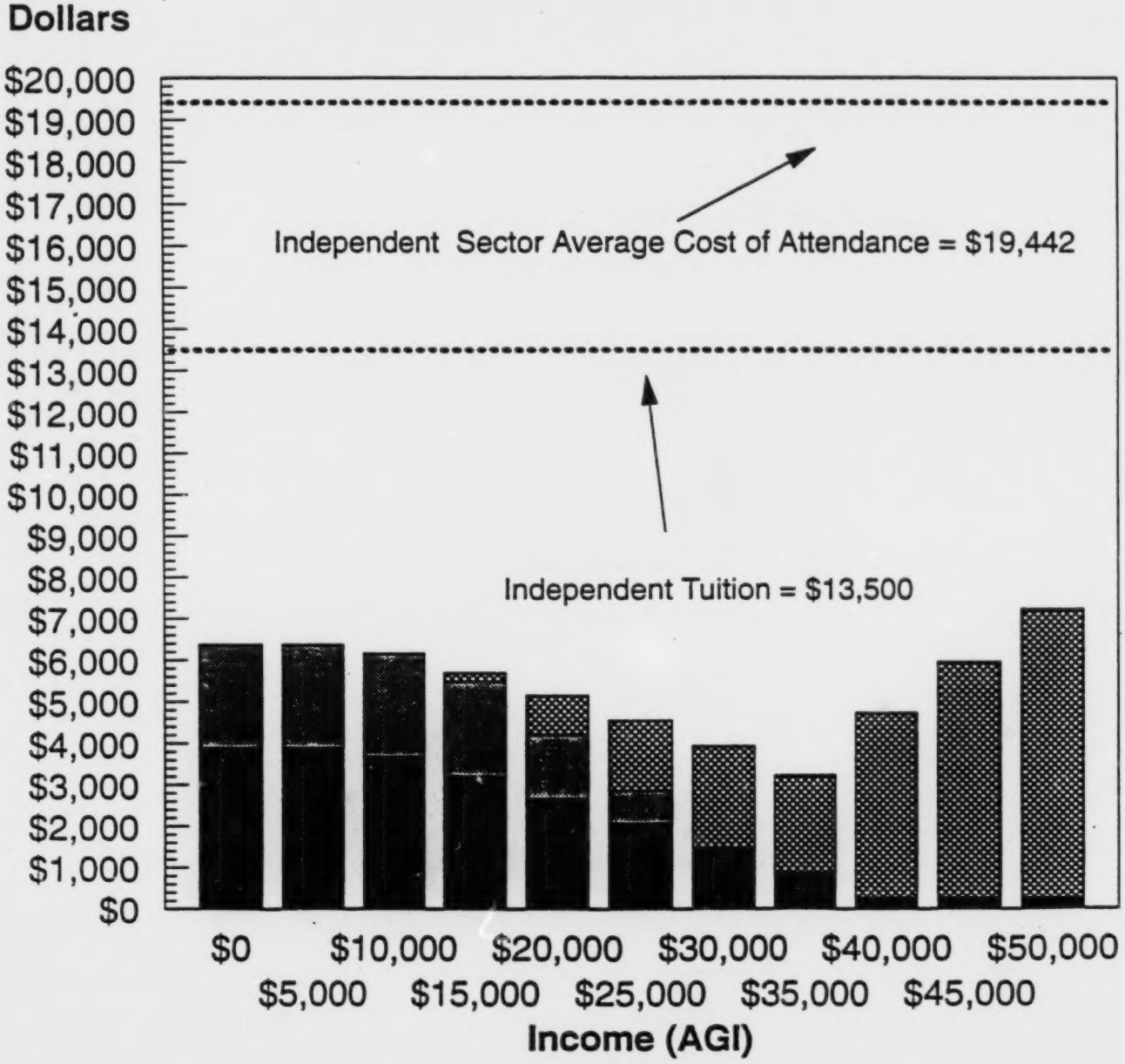


Chart 3
Comparison of Awards and Expected Family Contribution (EFC) at Various Income Levels
Independent Sector



V. The Cost of Meeting Full Tuition & Non-Tuition Allowances through State & Federal Grants & the Expected Family Contribution

Using the principles enumerated above for a model TAP Program, the Task Force considered the question of what such a program would consist of in practice. The approach included use of actual tuition cost and fixed allowances for non-tuition costs. The non-tuition cost for room and board are based on the allowances used in federal student financial aid programs. The allowance for books, supplies, and transportation was the same as that used in all costings and does not reflect the varying allowances established by institutions. To meet these costs the Task Force considered the resources available to a student, the student's family, federal and State grants (Pell & TAP), and loans. Institutionally funded grants and federally funded campus-based Title IV financial aid were not considered. These funds would also be available to some students to meet costs.

Establishing the costs to be considered in determining need and consequently, the level of support to be provided through publicly financed programs is no less difficult than determining what student and family resources constitute a reliable measurement of need. Tuition is an easily determined component and the principal educational cost faced by students. Non-tuition costs are difficult to define in that they cover a variety of student circumstances. Addressing a similar consideration in 1973, the Keppel Report suggested that at that time a total cost allowance at public colleges would be about $2,550 and at private colleges $4,500 (based on an average tuition of $2,100.)

In order to determine the magnitude of such an approach in 1996, the Task Force suggested that the following tuition and non-tuition cost allowances be used to establish total cost:

(1) Actual tuition charges: The tuitions in the following chart reflect 1996-97 tuition levels or for independent colleges and universities and public community colleges the average tuition in 1996-97. The non-tuition cost for room and board are based on the allowances used in federal student financial aid programs. The allowance for books, supplies, and transportation is the same as that used in all costings and does not reflect the varying allowances established by institutions. The allowances were used only to estimate a cost for the model at a minimum level of non-tuition costs. Actual student costs and allowances set by institutions are higher and these amounts are not included

in the following chart.

(2) Room & Board Allowances:

(a) Dependent students living at home $ 1,500

(b) All other students $ 5,000

(3) Books & Supplies & Transportation $ 1,000

	CUNY COMMUNITY COLLEGES	CUNY SENIOR COLLEGES	SUNY COMMUNITY COLLEGES	SUNY 4-YEAR COLLEGES	INDEPENDENT COLLEGES & PROPRIETARY COLLEGES
TUITION	$ 2,500	$ 3,200	$ 2,250	$ 3,400	$ 13,700
DEPENDENT STUDENTS LIVING AT HOME:					
* NON-TUITION ALLOWANCE	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 2,500
TOTAL ALLOWANCE	$ 5,000	$ 5,700	$ 4,750	$ 5,900	$ 16,200
ALL OTHER STUDENTS:					
* NON-TUITION ALLOWANCE	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 6,000
TOTAL ALLOWANCE	$ 8,500	$ 9,200	$ 8,250	$ 9,400	$ 19,700

* Actual student costs differ widely by institution, student circumstances, and community.

The student's Pell award, if any, and the Expected Family Contribution (EFC) as determined with the federal needs analysis system are first considered available to meet these total costs. In this approach the remaining need is the State grant that a student could receive. The estimated cost of meeting this remaining need would be $2.2 billion or $1.6 billion more than current TAP expenditures. The following chart shows the distribution of what expenditures would be by sector based on 1995-96 TAP data. Given the State's fiscal realities, it is unlikely that New York could afford this level of funding. Other aid such as campus-based awards, work study, loans, and institutional awards now help meet this need. State policy should be to support increases in federal Pell Grants, federal tax deductions and increased loan limits to help fill this gap.

Scenario

Tuition + Non-Tuition Allowance - Pell -EFC = TAP

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Cost (Millions of Dollars)

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	209.769	54.728	47.007	37.281	27.662	36.060	7.032
CUNY-CC	137.669	44.412	35.148	24.721	13.142	20.247	0.000
SUNY-SO	352.736	98.391	75.327	57.892	47.227	31.632	42.267
SUNY-CC	178.076	78.043	50.517	23.650	7.998	17.829	0.038
INDEPENDENT	1152.781	332.923	269.805	197.214	167.169	93.292	92.378
BUS-DEGREE	159.160	68.920	47.460	16.784	6.732	18.947	0.317
BUS-NONDEG	50.748	25.001	17.100	2.966	1.465	4.215	0.000
OTHER	5.163	1.459	1.398	0.803	0.436	1.066	0.000
	2246.101	703.878	543.762	361.311	271.831	223.287	142.030

Cost (Millions of Dollars)

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	98.793	28.311	24.742	17.937	12.986	14.518	0.300
CUNY-CC	56.272	19.233	14.948	9.782	5.057	7.253	0.000
SUNY-SO	108.209	33.584	26.731	19.735	15.996	10.825	1.338
SUNY-CC	61.740	27.530	17.795	8.000	2.692	5.721	0.001
INDEPENDENT	215.257	69.510	56.745	36.936	29.974	20.182	1.910
BUS-DEGREE	61.850	28.310	18.900	5.917	2.410	6.306	0.007
BUS-NONDEG	10.412	5.728	3.273	0.491	0.236	0.684	0.000
OTHER	1.800	0.514	0.510	0.280	0.157	0.340	0.000
	614.335	212.719	163.644	99.078	69.508	65.829	3.557

Baseline

Scenario

Tuition + Non-Tuition Allowance - Pell - EFC = TAP

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FTE Recipients

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	41,015	11,302	9,678	7,425	5,464	6,419	727
CUNY-CC	27,788	9,477	7,205	4,934	2,580	3,592	0
SUNY-SO	54,297	16,968	12,471	9,195	7,365	5,002	3,296
SUNY-CC	41,222	19,144	11,799	5,173	1,693	3,411	2
INDEPENDENT	82,453	24,678	19,906	14,085	11,537	7,579	4,668
BUS-DEGREE	18,952	8,460	5,626	1,956	780	2,116	14
BUS-NONDEG	6,138	3,004	2,097	361	181	495	0
OTHER	776	232	207	124	62	151	0
	272,641	93,265	68,989	43,253	29,662	28,765	8,707

FTE Recipients

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	41,532	11,519	9,807	7,478	5,520	6,484	724
CUNY-CC	27,988	9,594	7,253	4,949	2,587	3,605	0
SUNY-SO	55,113	17,350	12,718	9,279	7,431	5,059	3,276
SUNY-CC	43,557	20,517	12,506	5,303	1,746	3,483	2
INDEPENDENT	82,455	24,685	19,920	14,086	11,536	7,576	4,652
BUS-DEGREE	19,002	8,485	5,645	1,959	781	2,118	14
BUS-NONDEG	6,140	3,005	2,097	362	181	495	0
OTHER	790	239	210	125	63	153	0
	276,577	95,394	70,156	43,541	29,845	28,973	8,668

Baseline

VI. Recommendations

1. Recommendation: The separate TAP Application form should be eliminated.

The 1992 reauthorization of the Higher Education Act made significant changes in the federal student aid application process. These changes affected the application process for New York State student aid. Prior to the reauthorization, students and their families were able to complete a "common form" prepared by private companies, under contract with the federal government, to apply for federal, State and institutional aid. The New York versions of these forms included specific additional information, e.g., New York State taxable income, necessary for TAP processing. Reauthorization's provisions eliminated the authority for these "common forms." There must now be a distinct free form to apply for federal aid. While this form includes eight questions gathering information needed by states to award their aid, these eight questions must be non-financial and must serve all 50 states.

All of this means that New York State each year must develop, distribute and process, or contract for development, distribution and processing of, a TAP application form that is distinct from the federal aid application forms. Every effort was made to continue as simple and coordinated a process as possible by using federal data from the student's federal application and a supplemental form that avoided duplicating questions the student and family had already answered.

In New York, students and their families must complete a minimum of two forms to apply for federal and State aid. In addition to completing two forms, students now, more than ever, must be certain to review carefully the forms they complete and insure that they follow all instructions, and are completing the forms required by the schools to which they are applying. Families now apply for TAP by completing the Free Application for Federal Student Aid (FAFSA) and a State TAP application.

The establishment of a free federal application and the provision of federal data free to states have resulted in 35 states using only the Free Application for Federal Student Aid (FAFSA) for their state programs. Eleven other states

use the FAFSA as an application for their programs but subsequently send the student a supplemental form for state purposes. For 1996-97, only four states (Michigan, New York, Pennsylvania, and Tennessee) used both the FAFSA and a separate state specific application form.

Eliminating the separate TAP application form would vastly simplify the process for students and families. In addition, there would be administrative savings in the area of approximately $200,000-300,000 realized from eliminating printing and distribution of two million forms, and processing of nearly 600,000 TAP application forms. As described below, the proposal for continuing to use net income derived from federal data elements would allow the elimination of the application form. Under that proposal, however, it would be necessary to process an estimated 80,000 to 90,000 forms from applicants requesting use of New York State net taxable income as reflected on tax forms to determine TAP eligibility and award amounts.

2. <u>Recommendation: The method of calculating TAP should be simplified and while maintaining net taxable income as the base should allow for use of federal data elements</u>.

Options considered by the Task Force for revising the method of calculating TAP awards were the use of federal data to determine New York net taxable income and the use of expected family contribution in lieu of net taxable income.

a. Use of federal data to determine New York net taxable income:

Simplifying the application process for a TAP award through elimination of a separate application form was unanimously supported by members of The Task Force. To accomplish this it was necessary to consider how data from The Free Application for Federal Student Aid (FAFSA) available free to states can be used and yet maintain a New York State specific basis for determining TAP eligibility and awards.

The Task Force recommends that New York State net taxable income (NTI) continue to be the basis for the TAP program. Use of NTI is the only means to prevent significant shifts in student eligibility and award amounts.

The Task Force further recommends that the FAFSA be used as the primary application form for TAP. The federal data would be used to determine eligibility for TAP. This would include adjusting income data from federal tax returns as reported on the FAFSA to arrive at a net taxable income reflecting New York State standard deductions and exemptions. The following chart shows examples at various income levels of the calculation using 1996-97 standard deduction and exemption amounts.

Examples of Use of
Standard Deduction and Exemptions
(1996 Tax Year)

	Married 2 Children	Head of Household 1 Child	Single No Dependents	A Dependent Student Claimed By Parents
Income Reported on FAFSA	$40,000	$25,000	$12,000	$ 3,000
Standard Deduction	12,350	10,000	7,400	2,900
Exemptions	2,000	1,000	-0-	-0-
Net Taxable Income	$25,650	$14,000	$ 4,600	$ 100

It is estimated that 80% to 90% of all TAP recipients and their families use standard deductions and exemptions to determine their New York State net taxable income. Accordingly, for 450,000 to 500,000 TAP applicants, use of the federal data elements should yield the same net taxable income as would be reported on the student's and parents' New York income tax returns.

In this "save harmless" process students would be informed of all of the data used from the FAFSA to determine eligibility and the amount of the student's TAP award. Included would be a special caution that the student and parents review the income data and, if

the net taxable income as reported on New York State tax returns was different, that information should be reported to HESC. The net taxable income reported in such cases would be used to recalculate the student's award. Approximately 50,000 to 100,000 such forms would need to be processed.

For the most part, students and parents requesting use of a net taxable income different from that derived from the federal data elements would be those who itemized deductions or had other income which is not included in New York State taxable income, such as public pensions. Students and parents requesting this change would provide on the same form parents social security numbers and a release for verification of income data with records of the New York State Department of Taxation and Finance. For all others, a random sample of students would be selected and requested to provide information to also allow verification of income data. Federal requirements for verifying income resulting in changes on the FAFSA would also result in ensuring the accuracy of the income information used for tax purposes. Changes to information originally reported on the FAFSA are also available through the federal process.

There appears to be a cost associated with this proposal as a result of differences in reporting on the State and federal forms. If we assume that all of the people who have a net taxable income that is lower than their AGI less standard deductions are people who itemize on their tax forms or have retirement income and, if we further assume that all of these people would fill out a supplemental form and report their actual New York State net taxable income, there will be no reductions in awards. However, a number of people report an AGI on federal forms that is inconsistent with State tax data. When standard deductions and exemptions are deducted from their AGI, the result is a calculated NTI that is lower than the NTI reported to the New York State Tax Department. These people would get larger TAP awards and the costs associated with this reporting difference is shown on the following two pages.

Using Net Taxable Income Derived from AGI or as Reported on Supplemental Form

Cost (Millions of Dollars) Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	1.224	0.363	0.295	0.204	0.147	0.208	0.008
CUNY-CC	0.612	0.237	0.149	0.092	0.055	0.079	
SUNY-SO	3.514	1.220	0.863	0.621	0.480	0.275	0.055
SUNY-CC	1.731	0.876	0.504	0.176	0.058	0.117	0.000
INDEPENDENT	4.458	1.465	1.196	0.770	0.645	0.325	0.058
BUS-DEGREE	0.456	0.207	0.141	0.043	0.014	0.052	
BUS-NONDEG	0.030	0.016	0.010	0.001	0.000	0.003	
OTHER	0.041	0.017	0.010	0.004	0.001	0.009	
	12.067	4.401	3.167	1.910	1.400	1.067	0.122

FTE Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	16	3	1	1	2	7	2
CUNY-CC	3	1	0	0	0	2	
SUNY-SO	32	7	0	1	1	6	17
SUNY-CC	6	2	2	1	0	1	0
INDEPENDENT	23	3	1	1	1	3	14
BUS-DEGREE	2	1	0	0	1	0	
BUS-NONDEG	0	0	0	0	0	0	
OTHER	0	0	0	0	0	0	
	82	17	4	4	5	19	33

b. Use of a New York State modified EFC

An alternative discussed by the Task Force but not included as a recommendation was use of the federally determined expected family contribution adjusted to maintain the current level and distribution of TAP expenditures. The Task Force believes that before such an approach could be workable, the impact on students and institutions would need to be fully assessed. The federal EFC is the result of a complex formula which includes many variables and the impact of adjustments to these variables could have significant effects on students and families.

The use of federal EFC would allow students and families to use only the FAFSA to apply for TAP. The EFC is determined from the FAFSA and is the amount that the student and family can be expected to contribute toward a student's college cost. The federal EFC takes into consideration income as well as a portion of assets other than equity in a first home and untaxed income. The EFC is used in determining eligibility for the federal Pell grant, federal guaranteed student loans, and the federal work study programs.

The attached cost estimate is based on TAP and federal data for the 1995-96 school year. In lieu of using New York State net taxable income, a factor of 46% of the student's EFC was used with the TAP schedules. The maximum EFC of $8,000 was used as nearly equivalent to the ceiling of $50,500 net taxable income used in TAP currently.

As shown in the cost estimate, the total expenditures using 46% of EFC are within $2 million of current expenditures.

Using 46% EFC in TAP Schedules with $8,000 EFC Limit

Cost (Millions of Dollars) Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	-1.238	0.155	-0.082	-0.403	-0.448	-0.561	0.100
CUNY-CC	-0.409	0.009	-0.039	-0.139	-0.106	-0.134	
SUNY-SO	3.383	2.330	1.126	0.281	-0.090	-0.722	0.458
SUNY-CC	-2.936	-0.835	-0.689	-0.561	-0.284	-0.567	0.001
INDEPENDENT	3.877	3.077	1.815	-0.395	-0.557	-0.705	0.643
BUS-DEGREE	-0.490	-0.140	-0.018	-0.075	-0.081	-0.177	0.002
BUS-NONDEG	-0.113	-0.038	-0.040	-0.010	-0.010	-0.014	
OTHER	-0.017	0.009	-0.003	0.000	-0.011	-0.012	
	2.058	4.566	2.070	-1.302	-1.588	-2.892	1.204

FTE Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	-280	-128	-68	-29	-30	-28	3
CUNY-CC	-84	-52	-21	-3	-2	-6	
SUNY-SO	-1,349	-666	-404	-118	-98	-83	20
SUNY-CC	-743	-457	-219	-28	-10	-29	0
INDEPENDENT	-2,065	-891	-651	-235	-195	-109	16
BUS-DEGREE	-194	-96	-75	-11	-1	-11	0
BUS-NONDEG	-12	-7	-3	-1	0	-1	
OTHER	-16	-8	-3	-1	-1	-3	
	-4,743	-2,305	-1,444	-426	-337	-270	39

3. Recommendation: The federal and State criteria for determining financial independence should be reconciled

The Task Force discussed the need to reconcile the two very different sets of criteria used in the federal and State programs to determine if a student is financially independent. If financially independent, the parental income, if any, is not considered. It is generally recognized as one of the most difficult tasks for a student financial aid counselor to explain to a student why he or she is financially independent for federal programs but not for State programs or vice-versa.

The Task Force also considered the desirability of using federal criteria if the FAFSA is to be used as an application for TAP. If the separate State criteria continue to apply, students will have to use a supplemental form to provide the information to make a determination. This not only increases the number of such forms to be processed but delays award determinations for students and continues what students and the public generally perceive as an inequity and inefficiency of the student financial aid process.

The following chart details the federal criteria and the State criteria for determining financial independence.

Criteria for Granting Financial Independence

Federal Criteria:	State Criteria:
A. To be considered financially independent, a student must meet one of the following criteria:	A. To be considered financially independent, a student must meet the following criteria:
(1) 24 years of age or over.	(1) Be 35 years of age or over or
(2) A veteran of the U.S. Armed Forces	(2) Be an honorably discharged veteran of the armed forces and not claimed on parents returns or

Federal Criteria:	State Criteria:
(3) A graduate student or enrolled in a professional program beyond a Bachelor's degree.	(3) If under 35 years of age, a student must meet all of the follwoing basic criteria:
(4) An orphan or ward of the Court or a ward of the Court until 18 years of age.	(a) Not have lived in a apartment, house, or building owned or leased by parents for more than six weeks during the immediately preceding year, the current year, and the next year (a three year period.)
(5) Married.	(b) Not be claimed on the parents' federal or State income tax returns for the tax year used in determining eligibility for TAP and for the current year (a two year period.)
(6.) Have legal dependents other than a spouse.	(c) Not have received gifts, loans, or other financial assistance worth more than $750 from parents during the current year, the immediately preceding year, and the next year (a three year period.)
B. In unusual circumstances a student who does not meet any of the above criteria may still be considered to be independent on the basis of a financial aid administrator's judgement. Any such determination must be documented in the student's file.	(4) If under 22 years of age, a student must meet all of the above basic criteria and, in addition, must document that special conditions exist which render the student financially independent. Special conditions would include, but not be limited to, a student being a ward of the Court, receiving public assistance on his or her own behalf, or parents being permanently and totally disabled or deceased.

Federal Criteria:	State Criteria:
	(5) Graduate students and students who are under 22 years of age and who are married are also considered to be financially independent for TAP purposes if they meet the basic conditions described in A.(3) above.

Using Federal Dependency Criteria

Cost (Millions of Dollars) Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	-0.019	-0.010	0.029	0.026	-0.009	-0.066	0.011
CUNY-CC	0.107	0.015	0.027	0.011	0.010	0.044	
SUNY-SO	0.044	-0.142	0.054	0.045	0.003	-0.043	0.128
SUNY-CC	0.098	0.004	0.082	0.012	-0.001	-0.001	0.000
INDEPENDENT	-0.030	-0.074	0.101	-0.009	0.009	-0.265	0.209
BUS-DEGREE	-0.459	-0.139	-0.080	-0.038	-0.025	-0.176	0.000
BUS-NONDEG	0.009	0.002	0.005	0.002	-0.002	0.002	
OTHER	-0.013	0.000	0.000	0.002	-0.005	-0.011	
	-0.263	-0.344	0.218	0.050	-0.020	-0.516	0.348

FTE Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	-89	-25	-3	-7	-6	-38	-10
CUNY-CC	-32	-13	-4	-2	-2	-11	
SUNY-SO	-205	-82	-20	-9	-12	-54	-28
SUNY-CC	-111	-63	-16	-1	-3	-28	0
INDEPENDENT	-302	-88	-30	-14	-17	-57	-96
BUS-DEGREE	-80	-36	-16	-2	-2	-24	0
BUS-NONDEG	-1	0	0	0	0	-1	
OTHER	-9	-2	-2	0	-2	-3	
	-829	-309	-91	-35	-44	-216	-134

4. Recommendation: The award schedules for determining TAP awards should be consolidated.

For the 1996-97 academic year, there are thirteen TAP schedules used to determine awards. Which TAP schedule is used depends upon whether or not the student is a dependent student or financially independent; an undergraduate or graduate student; and attending a degree or non-degree institution; and the first year in which a student received State-funded financial aid.

The principal distinguishing feature of the undergraduate schedules for students attending degree granting institutions is that the maximum award of $3,900 applies to first-time recipients in the 1994-95, 1995-96, and 1996-97 school years. For all others the maximum award is $3,575. There are also three different income ceilings for eligibility, that is, $34,250, $42,500, and $50,500. There are two different minimum awards of $100 and $275. A similar situation exists for students who are financially independent.

The Task Force recommends that the eleven undergraduate schedules be reduced to four as follows:

1) Undergraduate award schedules - For students who are dependent on their parents, or who are financially independent and are married or have tax dependents:

At Degree-Granting Institutions:

MAX. AWARD - $3,900 or 90% of tuition whichever is less

MIN. AWARD - $275

NTB	REDUCTION
$ 7,000 or Less	0
7,001 - 11,000	7% of excess over $7,000
11,001 - 18,000	$280 + 10% of excess over $11,000
18,001 - 50,500	980 + 12% of excess over $18,000
50,501 or More	NO AWARD

At non-degree institutions:

MAX. AWARD - $800 or 90% of tuition whichever is less

MIN. AWARD - $100

NTB	REDUCTION
$ 7,000 or Less	0
7,001 - 11,000	7% of excess over $7,000
11,001 - 50,500	$280 + 10% of excess over $11,000
50,501 or More	NO AWARD

2) Undergraduate award schedule for students who are independent and single without dependents

At degree granting institutions:

MAX. AWARD - $3,025 or 90% of tuition whichever is less

MIN. AWARD - $275

NTB	REDUCTION
$ 3,000 or Less	0
3,001 - 10,000	31% of excess over $3,000
10,001 or More	NO AWARD

At non-degree institutions:

MAX. AWARD - $3,025 or 90% of tuition whichever is less

MIN. AWARD - $275

NTB	REDUCTION
$ 3,000 or Less	0
3,001 - 10,000	31% of excess over $3,000
10,001 or More	NO AWARD

Establishing these four schedules would provide the same maximum award, minimum awards, and income eligibility ceilings for the same categories of students regardless of the year in which they first received an award. The estimated increase in TAP projected to the 1997-98 school year to accomplish this would be $4 million. The detail of the cost estimate is attached.

BEST COPY AVAILABLE

Reducing the Number of TAP Schedules to 6

Cost (Millions of Dollars) Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	0.322					0.322	
CUNY-CC	0.034					0.034	
SUNY-SO	0.851					0.851	
SUNY-CC	0.044					0.044	
INDEPENDENT	1.970					1.970	
BUS-DEGREE	0.728					0.728	
BUS-NONDEG	0.040					0.040	
OTHER	0.024					0.024	
	4.013	0.000	0.000	0.000	0.000	4.013	0.000

FTE Change from Base

College Group	Total	Fresh.	Soph.	Junior	Senior	5th Yr.	Grad.
CUNY-SR	30					30	
CUNY-CC	3					3	
SUNY-SO	81					81	
SUNY-CC	11					11	
INDEPENDENT	80					80	
BUS-DEGREE	3					3	
BUS-NONDEG	0					0	
OTHER	1					1	
	209	0	0	0	0	209	0

5. **Future increases in TAP funding should be used first to restore TAP to 1990 levels.**

It was the consensus of the Task Force that, if funds become available to provide additional student financial aid, the funding should be used to restore TAP schedules and the amount of tuition covered to the levels enacted in 1988 and to be phased in beginning in 1990. This would mean:

(a) A maximum TAP award of $4,125 or full tuition, whichever is less, for dependent undergraduate students at degree granting institutions.

(b) For students who are financially independent and attend degree granting institutions, the maximum award would be $3,400 or full tuition, whichever is less.

(c) The minimum award would be $350 for all eligible students.

(d) The percentages used in the award schedules to determine reduction amounts would be reduced by one percentage point.

(e) The maximum award for graduate students would be $1,200 and the minimum award would be $100.

(f) At non-degree institutions the maximum award for dependent students would be $2,200 and for independent students $1,800.

The following appendices are attached:

A) Summaries of costings of proposals recommended by the Task Force by sector and by sector and class level,

B) Effect on students, by sector and income level, of the converted AGI proposal,

C) Effect on students, by sector and income level, of using 46% of EFC to determine TAP awards,

D) Effect on students, by sector and income level, of changes in independence criteria,

E) July 5, 1996 paper prepared by City University of New York in response to a discussion paper on restructuring of TAP,

F) The Student Bill of Rights as it appeared in the 1973 Keppel Report.

TAP TASK FORCE COSTINGS

SECTOR	1995-96 BASE	Use Converted AGI & Save Harmless		Use Federal Dependency		6 Schedules	
		Change	Result	Change	Result	Change	Result
CUNY SR	98.793	1.224	100.017	(0.019)	99.998	0.322	100.320
CUNY CC	56.272	0.612	56.884	0.107	56.991	0.034	57.025
SUNY SO	108.209	3.514	111.723	0.044	111.767	0.851	112.618
SUNY CC	61.740	1.731	63.471	0.098	63.569	0.044	63.613
INDEPENDENT	215.257	4.458	219.715	(0.030)	219.685	1.970	221.655
BUSINESS DEGREE	61.850	0.456	62.306	(0.459)	61.847	0.728	62.575
BUSINESS NON DEGREE	10.412	0.030	10.442	0.009	10.451	0.040	10.491
OTHER	1.800	0.041	1.841	(0.013)	1.828	0.024	1.852
TOTAL	$814.333	$12.066	$826.399	($0.263)	$826.136	$4.013	$830.149

APPENDIX A

(Converted AGI w/save harmless) Sector: CUNY SR Dependent Stude...s

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	18,353	0	0	0	0	0	0	18353	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,987	0	0	0	0	0	0	1984	3	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,824	0	0	0	0	0	0	1822	1	1	0	0	0	0
4	$ 6,001 to $ 8,000	1,761	0	0	0	0	0	0	1468	293	1	0	0	0	0
5	$ 8,001 to $10,000	1,555	0	0	0	0	0	0	1072	462	21	1	0	0	0
6	$10,001 to $12,000	1,480	0	0	0	0	0	0	978	259	242	1	0	0	0
7	$12,001 to $14,000	1,326	0	0	0	0	0	0	897	210	121	98	0	0	0
8	$14,001 to $16,000	1,122	0	0	0	0	0	0	713	187	91	51	81	0	0
9	$16,001 to $18,000	935	0	0	0	0	0	0	607	125	81	24	23	76	0
10	$18,001 to $20,000	834	0	0	0	0	0	0	556	97	69	23	19	25	46
11	$20,001 to $22,000	682	0	0	0	0	0	0	438	73	49	33	17	12	62
12	$22,001 to $24,000	539	0	0	0	0	0	0	327	74	44	18	19	13	45
13	$24,001 to $26,000	409	0	0	0	0	0	0	257	48	34	17	7	5	42
14	$26,001 to $28,000	395	0	0	0	0	0	0	243	40	29	16	9	5	53
15	$28,001 to $30,000	329	0	0	0	0	0	0	197	29	33	10	9	7	46
16	$30,001 to $32,000	324	0	0	0	0	0	0	210	42	18	14	4	5	32
17	$32,001 to $34,000	279	0	0	0	0	0	0	206	26	9	5	4	3	28
18	$34,001 to $36,000	242	0	0	0	0	0	0	205	5	5	2	1	4	21
19	$36,001 to $38,000	232	0	0	0	0	0	0	200	4	3	6	1	1	18
20	$38,001 to $40,000	189	0	0	0	0	0	0	164	2	3	5	0	0	15
21	$40,001 to $42,000	128	0	0	0	0	0	0	120	1	0	1	0	0	6
22	$42,001 to $44,000	110	0	0	0	0	0	0	95	3	1	0	0	0	12
23	$44,001 to $46,000	94	0	0	0	0	0	0	87	0	0	0	0	0	7
24	$46,001 to $48,000	88	0	0	0	0	0	0	78	0	1	0	0	0	9
25	$48,001 to $50,000	41	0	0	0	0	0	0	40	0	0	0	0	0	1

(Converted AGI w/save harmless) Sector: CUNY SR Independent Students

			<---------- LOSS							GAIN ---------->				
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	5,297	0	0	0	0	0	0	5292	5	1	0	0	0	0
2	$ 2,001 to $ 4,000	451	0	0	0	0	0	0	358	58	33	3	0	0	0
3	$ 4,001 to $ 6,000	243	0	0	0	0	0	0	162	8	13	37	17	7	0
4	$ 6,001 to $ 8,000	196	0	0	0	0	0	0	115	5	6	24	6	6	35
5	$ 8,001 to $10,000	92	0	0	0	0	0	0	50	7	3	14	1	0	18

(Converted AGI w/save harmless) Sector: CUNY CC Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	14,932	0	0	0	0	0	0	14932	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,134	0	0	0	0	0	0	1134	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,052	0	0	0	0	0	0	1052	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	1,011	0	0	0	0	0	0	850	161	0	0	0	0	0
5	$ 8,001 to $10,000	894	0	0	0	0	0	0	599	287	8	0	0	0	0
6	$10,001 to $12,000	817	0	0	0	0	0	0	507	152	158	0	0	0	0
7	$12,001 to $14,000	720	0	0	0	0	0	0	455	128	59	78	0	0	0
8	$14,001 to $16,000	611	0	0	0	0	0	0	374	107	42	26	63	0	0
9	$16,001 to $18,000	500	0	0	0	0	0	0	308	71	36	17	14	54	0
10	$18,001 to $20,000	414	0	0	0	0	0	0	244	60	46	10	5	18	32
11	$20,001 to $22,000	293	0	0	0	0	0	0	172	32	21	15	6	11	36
12	$22,001 to $24,000	249	0	0	0	0	0	0	153	29	29	4	5	4	25
13	$24,001 to $26,000	175	0	0	0	0	0	0	113	17	11	9	2	5	19
14	$26,001 to $28,000	173	0	0	0	0	0	0	104	18	10	5	5	5	25
15	$28,001 to $30,000	108	0	0	0	0	0	0	83	4	2	1	2	4	13
16	$30,001 to $32,000	102	0	0	0	0	0	0	79	3	4	3	2	2	11
17	$32,001 to $34,000	95	0	0	0	0	0	0	79	1	2	3	1	1	10
18	$34,001 to $36,000	79	0	0	0	0	0	0	63	1	2	0	0	0	13
19	$36,001 to $38,000	75	0	0	0	0	0	0	67	0	1	1	0	0	5
20	$38,001 to $40,000	50	0	0	0	0	0	0	47	2	0	0	0	0	2
21	$40,001 to $42,000	48	0	0	0	0	0	0	40	0	1	0	3	0	4
22	$42,001 to $44,000	33	0	0	0	0	0	0	30	0	0	0	0	0	3
23	$44,001 to $46,000	33	0	0	0	0	0	0	31	0	0	0	1	0	2
24	$46,001 to $48,000	24	0	0	0	0	0	0	21	0	0	0	0	0	3
25	$48,001 to $50,000	14	0	0	0	0	0	0	12	0	0	0	0	0	2

(Converted AGI w/save harmless) Sector: CUNY CC Independent Students

			<---------- LOSS							GAIN ---------->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	3,909	0	0	0	0	0	0	3909	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	201	0	0	0	0	0	0	150	34	17	0	0	0	0
3	$ 4,001 to $ 6,000	133	0	0	0	0	0	0	67	5	12	26	19	4	0
4	$ 6,001 to $ 8,000	81	0	0	0	0	0	0	37	0	2	9	6	7	21
5	$ 8,001 to $10,000	32	0	0	0	0	0	0	21	1	1	4	0	0	6

(Converted AGI w/save harmless) Sector: SUNY SO Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	12,885	0	0	0	0	0	0	12885	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	2,121	0	0	0	0	0	0	2108	13	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,984	0	0	0	0	0	0	1970	7	8	0	0	0	0
4	$ 6,001 to $ 8,000	2,037	0	0	0	0	0	0	1649	381	2	6	0	0	0
5	$ 8,001 to $10,000	2,007	0	0	0	0	0	0	1246	719	35	6	0	0	0
6	$10,001 to $12,000	1,986	0	0	0	0	0	0	1195	384	404	2	0	0	0
7	$12,001 to $14,000	1,889	0	0	0	0	0	0	1141	316	232	200	0	0	0
8	$14,001 to $16,000	1,814	0	0	0	0	0	0	1073	294	206	111	131	0	0
9	$16,001 to $18,000	1,829	0	0	0	0	0	0	1068	322	170	88	68	113	0
10	$18,001 to $20,000	1,616	0	0	0	0	0	0	985	213	170	93	39	48	70
11	$20,001 to $22,000	1,572	0	0	0	0	0	0	980	186	151	75	47	40	95
12	$22,001 to $24,000	1,573	0	0	0	0	0	0	950	237	116	74	45	32	120
13	$24,001 to $26,000	1,469	0	0	0	0	0	0	866	229	116	75	40	24	120
14	$26,001 to $28,000	1,436	0	0	0	0	0	0	869	225	96	70	40	31	106
15	$28,001 to $30,000	1,304	0	0	0	0	0	0	796	201	102	57	30	20	98
16	$30,001 to $32,000	1,310	0	0	0	0	0	0	819	193	98	53	33	30	85
17	$32,001 to $34,000	1,336	0	0	0	0	0	0	909	159	93	45	25	15	90
18	$34,001 to $36,000	1,268	0	0	0	0	0	0	1008	73	39	22	13	15	99
19	$36,001 to $38,000	1,097	0	0	0	0	0	0	968	36	17	13	10	12	42
20	$38,001 to $40,000	1,051	0	0	0	0	0	0	957	11	14	10	8	3	49
21	$40,001 to $42,000	870	0	0	0	0	0	0	810	12	9	7	2	7	24
22	$42,001 to $44,000	701	0	0	0	0	0	0	655	2	5	4	6	5	24
23	$44,001 to $46,000	693	0	0	0	0	0	0	663	6	3	0	3	2	17
24	$46,001 to $48,000	609	0	0	0	0	0	0	580	4	2	2	1	0	20
25	$48,001 to $50,000	314	0	0	0	0	0	0	299	2	2	1	2	1	8

(Converted AGI w/save harmless) Sector: SUN' SO Independent Students

			<---------- LOSS							GAIN ---------->				
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	6,776	0	0	0	0	0	0	6722	43	11	0	0	0	0
2	$ 2,001 to $ 4,000	748	0	0	0	0	0	0	577	71	68	32	0	0	0
3	$ 4,001 to $ 6,000	446	0	0	0	0	0	0	291	8	23	84	23	18	0
4	$ 6,001 to $ 8,000	241	0	0	0	0	0	0	128	9	5	33	6	14	48
5	$ 8,001 to $10,000	128	0	0	0	0	0	0	76	5	1	21	3	0	23

(Converted AGI w/save harmless) Sector: SUNY CC Dependent Students

			<-- LOSS						GAIN -->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	13,081	0	0	0	0	0	0	13081	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,516	0	0	0	0	0	0	1516	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,473	0	0	0	0	0	0	1473	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	1,650	0	0	0	0	0	0	1308	341	0	0	0	0	0
5	$ 8,001 to $10,000	1,411	0	0	0	0	0	0	867	530	13	0	0	0	0
6	$10,001 to $12,000	1,500	0	0	0	0	0	0	895	305	300	0	0	0	0
7	$12,001 to $14,000	1,374	0	0	0	0	0	0	848	220	169	137	0	0	0
8	$14,001 to $16,000	1,313	0	0	0	0	0	0	805	225	117	81	85	0	0
9	$16,001 to $18,000	1,251	0	0	0	0	0	0	779	187	112	53	33	87	0
10	$18,001 to $20,000	1,132	0	0	0	0	0	0	719	144	108	47	27	22	66
11	$20,001 to $22,000	1,035	0	0	0	0	0	0	617	164	78	60	32	16	68
12	$22,001 to $24,000	1,077	0	0	0	0	0	0	699	144	93	37	18	15	71
13	$24,001 to $26,000	1,002	0	0	0	0	0	0	733	98	45	29	15	15	68
14	$26,001 to $28,000	951	0	0	0	0	0	0	799	43	27	10	16	7	49
15	$28,001 to $30,000	879	0	0	0	0	0	0	787	19	11	10	6	10	38
16	$30,001 to $32,000	792	0	0	0	0	0	0	727	7	10	9	5	5	30
17	$32,001 to $34,000	776	0	0	0	0	0	0	718	9	6	8	8	4	24
18	$34,001 to $36,000	697	0	0	0	0	0	0	652	5	7	6	1	3	24
19	$36,001 to $38,000	632	0	0	0	0	0	0	602	5	4	3	4	3	12
20	$38,001 to $40,000	577	0	0	0	0	0	0	551	1	1	2	2	3	18
21	$40,001 to $42,000	529	0	0	0	0	0	0	514	1	1	1	1	0	12
22	$42,001 to $44,000	457	0	0	0	0	0	0	442	2	1	2	0	0	12
23	$44,001 to $46,000	453	0	0	0	0	0	0	434	2	2	1	0	2	12
24	$46,001 to $48,000	315	0	0	0	0	0	0	304	2	0	0	1	1	7
25	$48,001 to $50,000	164	0	0	0	0	0	0	155	0	2	0	0	0	7

(Converted AGI w/save harmless) Sector: SUNY CC Independent Students

			<---------- LOSS							GAIN ---------->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	6,134	0	0	0	0	0	0	6134	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	538	0	0	0	0	0	0	414	93	32	0	0	0	0
3	$ 4,001 to $ 6,000	427	0	0	0	0	0	0	245	11	28	91	38	15	0
4	$ 6,001 to $ 8,000	299	0	0	0	0	0	0	168	3	6	44	5	15	56
5	$ 8,001 to $10,000	126	0	0	0	0	0	0	73	6	7	9	5	2	25

(Converted AGI w/save harmless) Sector: INDEPENDENT Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	24,393	0	0	0	0	0	0	24393	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	3,163	0	0	0	0	0	0	3151	12	0	0	0	0	0
3	$ 4,001 to $ 6,000	2,926	0	0	0	0	0	0	2910	10	5	0	0	0	0
4	$ 6,001 to $ 8,000	3,238	0	0	0	0	0	0	2690	542	4	3	0	0	0
5	$ 8,001 to $10,000	3,166	0	0	0	0	0	0	2113	1024	25	4	0	0	0
6	$10,001 to $12,000	2,939	0	0	0	0	0	0	1925	525	484	5	0	0	0
7	$12,001 to $14,000	2,853	0	0	0	0	0	0	1786	489	318	260	0	0	0
8	$14,001 to $16,000	2,751	0	0	0	0	0	0	1717	449	247	158	179	0	0
9	$16,001 to $18,000	2,604	0	0	0	0	0	0	1730	384	204	83	73	130	0
10	$18,001 to $20,000	2,374	0	0	0	0	0	0	1532	332	202	106	52	52	97
11	$20,001 to $22,000	2,144	0	0	0	0	0	0	1339	278	181	117	59	44	127
12	$22,001 to $24,000	1,998	0	0	0	0	0	0	1299	224	164	96	63	30	120
13	$24,001 to $26,000	1,966	0	0	0	0	0	0	1252	237	180	74	38	39	144
14	$26,001 to $28,000	1,865	0	0	0	0	0	0	1210	260	143	76	36	31	109
15	$28,001 to $30,000	1,749	0	0	0	0	0	0	1148	233	117	68	37	22	124
16	$30,001 to $32,000	1,708	0	0	0	0	0	0	1127	234	140	51	35	30	92
17	$32,001 to $34,000	1,581	0	0	0	0	0	0	1019	222	110	76	25	26	102
18	$34,001 to $36,000	1,515	0	0	0	0	0	0	976	225	123	54	24	22	90
19	$36,001 to $38,000	1,420	0	0	0	0	0	0	926	201	126	53	20	11	82
20	$38,001 to $40,000	1,361	0	0	0	0	0	0	946	159	95	52	21	12	77
21	$40,001 to $42,000	1,178	0	0	0	0	0	0	918	97	54	26	12	10	60
22	$42,001 to $44,000	914	0	0	0	0	0	0	794	34	21	15	12	3	34
23	$44,001 to $46,000	805	0	0	0	0	0	0	726	9	11	9	10	10	30
24	$46,001 to $48,000	735	0	0	0	0	0	0	683	9	5	5	2	4	27
25	$48,001 to $50,000	389	0	0	0	0	0	0	366	2	3	2	0	1	16

(Converted AGI w/save harmless) Sector: INDEPENDENT Independent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	8,913	0	0	0	0	0	0	8862	46	5	0	0	0	0
2	$ 2,001 to $ 4,000	796	0	0	0	0	0	0	601	105	58	32	0	0	0
3	$ 4,001 to $ 6,000	540	0	0	0	0	0	0	333	18	33	108	24	24	0
4	$ 6,001 to $ 8,000	318	0	0	0	0	0	0	175	9	7	55	11	9	52
5	$ 8,001 to $10,000	154	0	0	0	0	0	0	91	4	1	28	2	1	27

(Converted AGI w/save harmless) Sector: BUS. DEGREE Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	9,931	0	0	0	0	0	0	9931	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	659	0	0	0	0	0	0	659	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	605	0	0	0	0	0	0	605	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	602	0	0	0	0	0	0	517	85	0	0	0	0	0
5	$ 8,001 to $10,000	584	0	0	0	0	0	0	396	184	4	0	0	0	0
6	$10,001 to $12,000	493	0	0	0	0	0	0	351	81	61	0	0	0	0
7	$12,001 to $14,000	457	0	0	0	0	0	0	311	75	43	29	0	0	0
8	$14,001 to $16,000	399	0	0	0	0	0	0	277	59	29	14	19	0	0
9	$16,001 to $18,000	382	0	0	0	0	0	0	281	49	21	10	10	12	0
10	$18,001 to $20,000	316	0	0	0	0	0	0	224	37	22	9	5	2	17
11	$20,001 to $22,000	271	0	0	0	0	0	0	193	31	17	10	4	1	15
12	$22,001 to $24,000	252	0	0	0	0	0	0	183	20	16	11	1	1	20
13	$24,001 to $26,000	215	0	0	0	0	0	0	154	25	9	10	1	3	13
14	$26,001 to $28,000	199	0	0	0	0	0	0	139	22	14	6	2	2	15
15	$28,001 to $30,000	168	0	0	0	0	0	0	110	26	10	3	3	3	12
16	$30,001 to $32,000	155	0	0	0	0	0	0	107	19	6	3	2	0	17
17	$32,001 to $34,000	139	0	0	0	0	0	0	111	10	5	2	3	1	8
18	$34,001 to $36,000	103	0	0	0	0	0	0	85	6	3	1	1	0	6
19	$36,001 to $38,000	96	0	0	0	0	0	0	72	8	4	1	1	0	10
20	$38,001 to $40,000	94	0	0	0	0	0	0	70	10	7	4	0	1	3
21	$40,001 to $42,000	85	0	0	0	0	0	0	65	5	4	3	1	1	5
22	$42,001 to $44,000	68	0	0	0	0	0	0	58	2	0	1	1	0	6
23	$44,001 to $46,000	70	0	0	0	0	0	0	64	0	0	0	0	1	5
24	$46,001 to $48,000	46	0	0	0	0	0	0	43	0	1	0	0	0	2
25	$48,001 to $50,000	22	0	0	0	0	0	0	20	1	0	0	0	0	1

(Converted AGI w/save harmless) Sector: BUS. DEGREE Independent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	GAIN $1 to $200 -->	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	2,163	0	0	0	0	0	0	2163	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	139	0	0	0	0	0	0	116	14	9	0	0	0	0
3	$ 4,001 to $ 6,000	129	0	0	0	0	0	0	73	4	12	24	9	7	0
4	$ 6,001 to $ 8,000	92	0	0	0	0	0	0	57	0	2	12	4	9	7
5	$ 8,001 to $10,000	60	0	0	0	0	0	0	39	3	1	8	0	0	10

(Converted AGI w/save harmless) Sector: BUS. NON-DEGREE Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	4,381	0	0	0	0	0	0	4381	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	146	0	0	0	0	0	0	146	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	114	0	0	0	0	0	0	114	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	97	0	0	0	0	0	0	86	11	0	0	0	0	0
5	$ 8,001 to $10,000	78	0	0	0	0	0	0	58	20	0	0	0	0	0
6	$10,001 to $12,000	74	0	0	0	0	0	0	58	9	7	0	0	0	0
7	$12,001 to $14,000	53	0	0	0	0	0	0	36	12	2	3	0	0	0
8	$14,001 to $16,000	50	0	0	0	0	0	0	34	5	5	3	4	0	0
9	$16,001 to $18,000	46	0	0	0	0	0	0	35	7	2	0	1	2	0
10	$18,001 to $20,000	25	0	0	0	0	0	0	16	2	1	0	1	6	0
11	$20,001 to $22,000	15	0	0	0	0	0	0	11	1	1	0	1	1	1
12	$22,001 to $24,000	10	0	0	0	0	0	0	10	0	0	0	0	0	0
13	$24,001 to $26,000	16	0	0	0	0	0	0	12	0	0	0	2	3	0
14	$26,001 to $28,000	18	0	0	0	0	0	0	12	3	0	0	0	3	0
15	$28,001 to $30,000	16	0	0	0	0	0	0	16	0	0	0	0	0	0
16	$30,001 to $32,000	7	0	0	0	0	0	0	6	0	0	0	1	0	0
17	$32,001 to $34,000	8	0	0	0	0	0	0	7	0	0	0	0	1	0
18	$34,001 to $36,000	6	0	0	0	0	0	0	5	0	0	0	0	1	0
19	$36,001 to $38,000	2	0	0	0	0	0	0	1	0	0	0	0	1	0
20	$38,001 to $40,000	5	0	0	0	0	0	0	5	0	0	0	0	0	0
21	$40,001 to $42,000	2	0	0	0	0	0	0	1	0	1	0	0	0	0
22	$42,001 to $44,000	2	0	0	0	0	0	0	2	0	0	0	0	1	0
23	$44,001 to $46,000	4	0	0	0	0	0	0	3	0	0	0	0	1	0
24	$46,001 to $48,000	3	0	0	0	0	0	0	3	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Converted AG w/save harmless) Sector: BUS. NON-DEGREE Independent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	916	0	0	0	0	0	0	916	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	15	0	0	0	0	0	0	12	2	1	0	0	0	0
3	$ 4,001 to $ 6,000	15	0	0	0	0	0	0	4	0	3	5	3	0	0
4	$ 6,001 to $ 8,000	12	0	0	0	0	0	0	6	0	1	0	4	0	0
5	$ 8,001 to $10,000	5	0	0	0	0	0	0	2	0	0	0	2	0	0

(Converted AGI w/save harmless) Sector: OTHER Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	176	0	0	0	0	0	0	176	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	28	0	0	0	0	0	0	28	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	28	0	0	0	0	0	0	28	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	25	0	0	0	0	0	0	22	3	0	0	0	0	0
5	$ 8,001 to $10,000	23	0	0	0	0	0	0	14	9	0	0	0	0	0
6	$10,001 to $12,000	31	0	0	0	0	0	0	24	4	3	0	0	0	0
7	$12,001 to $14,000	25	0	0	0	0	0	0	16	5	1	3	0	0	0
8	$14,001 to $16,000	19	0	0	0	0	0	0	18	1	0	0	0	0	0
9	$16,001 to $18,000	29	0	0	0	0	0	0	26	1	1	0	0	1	0
10	$18,001 to $20,000	27	0	0	0	0	0	0	20	2	1	0	1	1	2
11	$20,001 to $22,000	24	0	0	0	0	0	0	17	3	1	0	0	0	3
12	$22,001 to $24,000	28	0	0	0	0	0	0	22	2	2	0	0	1	1
13	$24,001 to $26,000	21	0	0	0	0	0	0	16	2	0	1	0	0	3
14	$26,001 to $28,000	26	0	0	0	0	0	0	20	5	0	1	0	0	1
15	$28,001 to $30,000	21	0	0	0	0	0	0	16	3	0	1	0	0	1
16	$30,001 to $32,000	16	0	0	0	0	0	0	12	2	1	1	0	0	0
17	$32,001 to $34,000	14	0	0	0	0	0	0	10	1	2	0	1	0	1
18	$34,001 to $36,000	16	0	0	0	0	0	0	13	1	1	0	1	1	0
19	$36,001 to $38,000	17	0	0	0	0	0	0	16	1	0	0	0	0	0
20	$38,001 to $40,000	6	0	0	0	0	0	0	6	0	0	0	0	0	0
21	$40,001 to $42,000	4	0	0	0	0	0	0	3	0	0	0	0	0	1
22	$42,001 to $44,000	6	0	0	0	0	0	0	5	0	0	0	0	0	1
23	$44,001 to $46,000	5	0	0	0	0	0	0	4	0	0	0	1	0	0
24	$46,001 to $48,000	5	0	0	0	0	0	0	5	0	0	0	0	0	0
25	$48,001 to $50,000	5	0	0	0	0	0	0	5	0	0	0	0	0	0

(Converted AGI w/save harmless) Sector: OTHER Indepen ent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	110	0	0	0	0	0	0	110	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	19	0	0	0	0	0	0	17	1	2	0	0	0	0
3	$ 4,001 to $ 6,000	16	0	0	0	0	0	0	11	0	2	2	1	0	0
4	$ 6,001 to $ 8,000	14	0	0	0	0	0	0	9	0	0	4	1	0	0
5	$ 8,001 to $10,000	5	0	0	0	0	0	0	4	0	0	1	0	0	0

(EFC @46%) Sector: CUNY SR Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	18,353	537	183	268	334	514	932	15587	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,987	138	52	64	56	88	211	1347	32	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,824	174	44	60	76	99	252	1093	7	19	0	0	0	0
4	$ 6,001 to $ 8,000	1,761	188	35	66	88	116	330	466	446	16	10	0	0	0
5	$ 8,001 to $10,000	1,555	171	35	58	68	95	235	4	839	22	30	0	0	0
6	$10,001 to $12,000	1,480	128	34	41	57	84	169	2	360	586	21	0	0	0
7	$12,001 to $14,000	1,326	104	22	34	55	74	115	2	270	335	316	0	0	0
8	$14,001 to $16,000	1,122	77	29	24	39	42	72	2	129	275	230	205	0	0
9	$16,001 to $18,000	935	66	13	18	35	35	39	3	93	166	179	133	157	0
10	$18,001 to $20,000	834	68	16	20	24	25	39	0	62	119	153	111	87	117
11	$20,001 to $22,000	682	42	13	8	17	25	29	0	53	68	93	99	74	163
12	$22,001 to $24,000	539	22	10	17	11	15	23	0	32	50	53	86	57	164
13	$24,001 to $26,000	409	2	10	20	15	14	13	2	12	17	49	45	50	162
14	$26,001 to $28,000	395	0	5	7	24	22	9	4	12	18	33	37	42	182
15	$28,001 to $30,000	329	0	0	2	8	18	18	2	10	20	27	29	26	169
16	$30,001 to $32,000	324	0	0	0	2	7	18	14	9	15	13	34	37	175
17	$32,001 to $34,000	279	0	0	0	0	6	5	27	11	14	22	28	29	138
18	$34,001 to $36,000	242	0	0	0	0	4	4	34	22	17	25	21	20	96
19	$36,001 to $38,000	232	0	0	0	0	11	3	45	14	17	19	14	16	93
20	$38,001 to $40,000	189	0	0	0	0	8	8	54	10	16	15	10	7	62
21	$40,001 to $42,000	128	0	0	0	0	10	4	34	10	10	10	8	7	35
22	$42,001 to $44,000	110	0	0	0	0	18	1	29	5	5	10	6	9	29
23	$44,001 to $46,000	94	0	0	0	0	15	2	28	7	4	7	10	4	19
24	$46,001 to $48,000	88	0	0	0	0	20	2	21	1	3	2	2	2	36
25	$48,001 to $50,000	41	0	0	0	0	11	0	11	1	1	3	0	1	14

(EFC @46%) Sector: CUNY SR Independent Students

Group	Income Range	FTE	<-- LOSS: more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN: $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001 -->
1	$ 0 to $ 2,000	5,297	229	154	316	342	912	510	2823	12	1	0	0	0	0
2	$ 2,001 to $ 4,000	451	161	108	7	10	15	18	46	26	25	35	0	0	0
3	$ 4,001 to $ 6,000	243	39	60	57	3	6	3	0	2	14	43	11	6	0
4	$ 6,001 to $ 8,000	196	18	7	25	59	30	1	0	1	2	7	2	6	38
5	$ 8,001 to $10,000	92	1	2	1	6	34	22	2	1	1	0	3	2	19

(EFC @46%) Sector: CUNY CC Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	14,932	214	102	134	181	279	438	13585	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,134	61	24	17	31	33	76	893	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,052	65	13	23	24	37	120	770	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	1,011	66	21	29	45	63	180	337	270	0	0	0	0	0
5	$ 8,001 to $10,000	894	55	19	16	37	48	121	2	577	21	0	0	0	0
6	$10,001 to $12,000	817	53	6	20	24	41	90	3	235	345	0	0	0	0
7	$12,001 to $14,000	720	42	8	12	19	28	42	3	159	191	217	0	0	0
8	$14,001 to $16,000	611	27	8	9	9	19	35	3	78	166	105	154	0	0
9	$16,001 to $18,000	500	25	7	7	7	15	27	0	42	91	102	70	109	0
10	$18,001 to $20,000	414	8	17	11	9	20	18	2	29	49	78	45	54	75
11	$20,001 to $22,000	293	0	3	14	6	5	12	1	12	27	40	50	37	87
12	$22,001 to $24,000	249	0	0	4	15	20	6	1	7	19	16	33	29	102
13	$24,001 to $26,000	175	0	0	0	1	5	11	0	8	11	12	32	21	74
14	$26,001 to $28,000	173	0	0	0	0	2	2	17	6	7	13	17	14	96
15	$28,001 to $30,000	108	0	0	0	0	4	1	15	6	6	14	9	9	46
16	$30,001 to $32,000	102	0	0	0	0	4	0	21	4	12	9	9	6	37
17	$32,001 to $34,000	95	0	0	0	0	4	2	23	7	6	9	8	10	29
18	$34,001 to $36,000	79	0	0	0	0	2	0	22	6	8	6	6	8	22
19	$36,001 to $38,000	75	0	0	0	0	4	2	27	5	2	3	9	6	18
20	$38,001 to $40,000	50	0	0	0	0	4	2	20	4	5	1	3	2	11
21	$40,001 to $42,000	48	0	0	0	0	6	0	24	2	1	1	2	1	11
22	$42,001 to $44,000	33	0	0	0	0	5	0	14	1	0	0	4	3	8
23	$44,001 to $46,000	33	0	0	0	0	4	0	18	0	1	0	1	1	10
24	$46,001 to $48,000	24	0	0	0	0	4	0	9	1	1	1	0	1	8
25	$48,001 to $50,000	14	0	0	0	0	2	0	5	0	0	0	0	1	6

(EFC @46%) Sector: CUNY CC Independent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	3,909	98	105	189	190	725	370	2231	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	201	77	38	6	5	8	6	33	18	10	0	0	0	0
3	$ 4,001 to $ 6,000	133	26	31	22	1	3	4	0	4	9	16	13	5	0
4	$ 6,001 to $ 8,000	81	0	2	8	22	9	1	1	1	2	4	2	7	25
5	$ 8,001 to $10,000	32	0	0	0	1	11	9	1	0	0	0	1	1	9

(EFC @46%) Sector: SUNY SO Dependant Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	12,885	1082	268	338	497	655	1550	8491	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	2,121	258	80	84	136	177	373	870	142	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,984	246	48	89	151	192	390	759	26	84	0	0	0	0
4	$ 6,001 to $ 8,000	2,037	279	70	92	169	221	391	362	349	61	43	0	0	0
5	$ 8,001 to $10,000	2,007	273	58	90	153	203	304	7	776	29	115	0	0	0
6	$10,001 to $12,000	1,986	232	69	86	128	171	266	7	415	516	98	0	0	0
7	$12,001 to $14,000	1,889	254	40	64	93	133	203	7	314	366	416	0	0	0
8	$14,001 to $16,000	1,814	188	41	55	70	111	188	4	258	348	353	199	0	0
9	$16,001 to $18,000	1,829	168	40	44	72	95	169	3	206	331	357	189	157	0
10	$18,001 to $20,000	1,616	143	28	39	66	75	115	3	170	253	277	203	137	108
11	$20,001 to $22,000	1,572	126	34	42	44	63	80	2	164	177	235	232	175	199
12	$22,001 to $24,000	1,573	112	25	32	43	53	78	3	104	147	170	246	217	343
13	$24,001 to $26,000	1,469	59	35	30	38	44	60	3	74	109	166	207	193	451
14	$26,001 to $28,000	1,436	21	21	60	28	34	50	4	64	89	146	158	177	583
15	$28,001 to $30,000	1,304	1	14	34	72	54	38	3	53	80	99	132	156	568
16	$30,001 to $32,000	1,310	2	3	7	23	74	62	7	57	64	93	133	143	642
17	$32,001 to $34,000	1,336	1	1	3	6	40	72	61	32	66	104	119	144	688
18	$34,001 to $36,000	1,268	0	2	1	2	53	20	142	58	81	87	109	122	594
19	$36,001 to $38,000	1,097	0	0	5	1	45	21	159	62	90	76	92	93	452
20	$38,001 to $40,000	1,051	0	0	0	0	66	17	227	69	84	85	93	74	336
21	$40,001 to $42,000	870	0	0	0	0	68	11	201	68	65	56	79	56	267
22	$42,001 to $44,000	701	0	0	0	0	98	0	166	38	55	53	48	40	203
23	$44,001 to $46,000	693	0	0	0	0	108	6	186	37	42	51	41	38	187
24	$46,001 to $48,000	609	0	0	0	0	128	5	169	29	27	36	30	24	163
25	$48,001 to $50,000	314	0	0	0	0	61	2	76	11	11	18	21	15	101

(EFC @46%) Sector: SUNY SO Independent Students

			<---------- LOSS						GAIN ---------->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	$2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	6,776	457	256	423	409	468	493	4128	110	32	0	0	0	0
2	$ 2,001 to $ 4,000	748	238	119	12	22	20	24	38	22	87	163	0	0	0
3	$ 4,001 to $ 6,000	446	57	107	106	6	9	3	0	13	24	93	15	12	0
4	$ 6,001 to $ 8,000	241	11	14	36	81	22	4	0	5	7	7	8	13	35
5	$ 8,001 to $10,000	128	2	2	1	8	57	24	0	0	4	4	4	4	20

(EFC @46%) Sector: SUNY CC Dependent Students

Group	Income Range	FTE	LOSS: more than $1001	LOSS: $801 to $1000	LOSS: $601 to $800	LOSS: $401 to $600	LOSS: $201 to $400	LOSS: $2 to $200	NO CHANGE	GAIN: $2 to $200	GAIN: $201 to $400	GAIN: $401 to $600	GAIN: $601 to $800	GAIN: $801 to $1000	GAIN: more than $1001
1	$ 0 to $ 2,000	13,081	1026	289	374	450	526	850	9563	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	1,516	192	56	64	87	101	195	820	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	1,473	218	65	59	74	119	223	716	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	1,650	234	70	97	125	176	289	348	312	0	0	0	0	0
5	$ 8,001 to $10,000	1,411	213	58	78	113	153	214	4	563	15	0	0	0	0
6	$10,001 to $12,000	1,500	182	52	63	123	137	223	2	297	421	0	0	0	0
7	$12,001 to $14,000	1,374	156	63	63	71	105	161	6	247	259	244	0	0	0
8	$14,001 to $16,000	1,313	75	99	46	66	83	124	9	198	253	190	171	0	0
9	$16,001 to $18,000	1,251	14	56	93	65	86	116	7	163	218	176	123	136	0
10	$18,001 to $20,000	1,132	1	17	60	92	71	64	3	117	162	183	163	97	99
11	$20,001 to $22,000	1,035	2	2	16	55	104	90	5	95	97	167	163	102	139
12	$22,001 to $24,000	1,077	0	0	2	12	52	106	60	63	117	131	167	141	224
13	$24,001 to $26,000	1,002	0	0	1	1	22	28	154	64	96	112	145	115	263
14	$26,001 to $28,000	951	0	0	0	0	17	5	234	67	103	118	112	89	207
15	$28,001 to $30,000	879	0	0	0	0	24	2	236	88	96	114	109	66	144
16	$30,001 to $32,000	792	0	0	0	0	17	1	291	93	78	76	77	52	108
17	$32,001 to $34,000	776	0	0	0	0	27	4	340	84	74	65	60	39	84
18	$34,001 to $36,000	697	0	0	0	0	25	4	363	61	55	57	30	28	76
19	$36,001 to $38,000	632	0	0	0	0	22	4	381	47	43	32	31	16	56
20	$38,001 to $40,000	577	0	0	0	0	35	0	358	40	28	27	16	10	63
21	$40,001 to $42,000	529	0	0	0	0	37	2	354	25	33	15	12	7	45
22	$42,001 to $44,000	457	0	0	0	0	57	3	271	23	20	16	12	6	51
23	$44,001 to $46,000	453	0	0	0	0	72	2	275	21	7	8	7	11	50
24	$46,001 to $48,000	315	0	0	0	0	73	0	164	9	3	6	11	9	42
25	$48,001 to $50,000	164	0	0	0	0	36	0	81	8	4	6	3	4	23

(EFC @46%) Sector: SUNY CC Independent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN --> $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	6,134	340	293	496	480	570	549	3204	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	538	240	128	9	15	21	21	54	31	18	0	0	0	0
3	$ 4,001 to $ 6,000	427	34	110	127	16	10	8	1	21	25	37	27	12	0
4	$ 6,001 to $ 8,000	299	0	2	37	90	54	22	3	11	12	8	10	11	40
5	$ 8,001 to $10,000	126	0	0	0	0	6	31	58	2	4	4	3	2	19

(EFC @46%) Sector: INDEPENDENT Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	24,393	1618	424	693	970	1277	1961	17448	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	3,163	415	128	124	155	213	481	1461	206	0	0	0	0	0
3	$ 4,001 to $ 6,000	2,926	411	100	109	191	251	484	1204	47	129	0	0	0	0
4	$ 6,001 to $ 8,000	3,238	478	125	145	209	288	608	597	583	122	82	0	0	0
5	$ 8,001 to $10,000	3,166	420	79	148	190	300	499	10	1309	42	169	0	0	0
6	$10,001 to $12,000	2,939	402	76	132	151	236	383	9	621	772	155	0	0	0
7	$12,001 to $14,000	2,853	344	89	88	147	209	312	2	494	573	612	0	0	0
8	$14,001 to $16,000	2,751	313	52	82	119	162	244	3	407	559	519	291	0	0
9	$16,001 to $18,000	2,604	294	54	83	98	149	187	7	342	469	483	232	205	0
10	$18,001 to $20,000	2,374	253	52	62	75	98	147	6	223	388	415	304	164	186
11	$20,001 to $22,000	2,144	221	51	53	80	84	109	0	166	234	328	306	233	279
12	$22,001 to $24,000	1,998	198	44	41	62	71	99	3	134	178	252	270	257	387
13	$24,001 to $26,000	1,966	165	32	39	61	62	85	1	103	148	230	208	256	573
14	$26,001 to $28,000	1,865	139	31	45	37	62	78	0	82	135	168	197	215	674
15	$28,001 to $30,000	1,749	97	50	46	32	40	53	1	70	96	149	192	178	738
16	$30,001 to $32,000	1,708	58	49	53	41	37	48	2	80	85	131	142	169	811
17	$32,001 to $34,000	1,581	60	9	33	67	48	44	0	55	77	101	118	158	810
18	$34,001 to $36,000	1,515	0	49	22	28	75	41	0	54	77	91	126	109	844
19	$36,001 to $38,000	1,420	0	0	42	31	41	64	12	52	53	86	98	117	824
20	$38,001 to $40,000	1,361	0	0	0	41	63	64	21	63	69	79	77	85	799
21	$40,001 to $42,000	1,178	0	0	0	0	122	27	28	49	59	72	76	79	664
22	$42,001 to $44,000	914	0	0	0	0	142	3	13	39	60	57	61	61	478
23	$44,001 to $46,000	805	0	0	0	0	137	5	15	47	42	50	42	46	420
24	$46,001 to $48,000	735	0	0	0	0	146	5	9	45	44	39	37	31	380
25	$48,001 to $50,000	389	0	0	0	0	102	1	6	21	15	20	22	14	188

(EFC 0466) Sector: INDEPENDENT Independent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	8,913	429	282	601	506	1037	630	5300	103	22	0	0	0	0
2	$ 2,001 to $ 4,000	796	241	143	17	24	16	41	49	32	83	147	0	0	0
3	$ 4,001 to $ 6,000	540	69	129	107	8	12	13	0	15	27	130	15	13	0
4	$ 6,001 to $ 8,000	318	17	13	43	125	33	5	0	7	12	10	5	7	41
5	$ 8,001 to $10,000	154	2	4	2	10	71	29	0	3	1	3	3	2	24

(EFC @46%) Sector: BUS. DEGREE Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	9,931	336	90	110	128	236	282	8750	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	659	50	11	17	18	16	41	506	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	605	65	6	20	17	26	65	406	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	602	64	13	17	21	33	89	182	182	0	0	0	0	0
5	$ 8,001 to $10,000	584	56	12	16	17	34	81	4	349	14	1	0	0	0
6	$10,001 to $12,000	493	41	8	14	20	25	53	1	102	228	0	0	0	0
7	$12,001 to $14,000	457	45	10	12	16	19	40	1	84	106	125	0	0	0
8	$14,001 to $16,000	399	44	7	10	9	19	29	2	48	83	65	83	0	0
9	$16,001 to $18,000	382	48	6	7	9	15	18	0	30	79	64	53	53	0
10	$18,001 to $20,000	316	32	3	4	7	8	15	3	25	42	53	47	24	53
11	$20,001 to $22,000	271	35	7	8	4	8	13	1	9	26	48	31	21	59
12	$22,001 to $24,000	252	22	4	9	5	10	8	0	8	12	26	38	31	79
13	$24,001 to $26,000	215	19	4	4	2	6	7	1	7	13	14	30	25	83
14	$26,001 to $28,000	199	9	5	6	6	8	9	1	9	6	8	20	27	85
15	$28,001 to $30,000	168	14	1	6	2	6	7	1	4	7	4	15	18	82
16	$30,001 to $32,000	155	4	3	3	5	4	3	0	8	8	10	10	20	76
17	$32,001 to $34,000	139	2	1	5	5	4	2	0	4	6	8	7	14	79
18	$34,001 to $36,000	103	0	4	3	1	0	4	1	6	1	5	6	9	60
19	$36,001 to $38,000	96	0	0	4	4	2	4	0	3	6	4	5	12	52
20	$38,001 to $40,000	94	0	0	0	7	3	4	1	2	7	4	3	10	54
21	$40,001 to $42,000	85	0	0	0	0	9	0	1	5	6	3	8	5	48
22	$42,001 to $44,000	68	0	0	0	0	8	0	3	6	2	7	5	6	31
23	$44,001 to $46,000	70	0	0	0	0	13	1	2	8	5	5	2	3	31
24	$46,001 to $48,000	46	0	0	0	0	10	0	0	3	1	5	2	6	17
25	$48,001 to $50,000	22	0	0	0	0	8	0	0	2	1	1	0	0	10

(EFC @46%) Sector: BUS. DEGREE Independent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001 -->
1	$ 0 to $ 2,000	2,163	104	68	125	120	270	199	1277	1	0	0	0	0	0
2	$ 2,001 to $ 4,000	139	54	42	3	4	3	5	17	9	1	0	0	0	0
3	$ 4,001 to $ 6,000	129	14	49	30	3	0	3	0	1	9	4	9	7	0
4	$ 6,001 to $ 8,000	92	6	2	12	32	9	0	0	3	2	1	3	4	17
5	$ 8,001 to $10,000	60	0	0	0	4	31	11	0	0	0	1	0	2	9

(EFC @46%) Sector: BUS. NON-DEGREE Dependent Students

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $2 to $200	NO CHANGE	GAIN $2 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	4,381	5	25	21	36	71	85	4139	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	146	0	9	4	1	5	7	121	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	114	2	9	3	2	2	11	86	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	97	1	7	2	1	5	16	37	28	0	0	0	0	0
5	$ 8,001 to $10,000	78	1	1	5	4	3	9	0	55	1	0	0	0	0
6	$10,001 to $12,000	74	1	1	1	3	2	8	0	25	35	0	0	0	0
7	$12,001 to $14,000	53	1	0	0	2	5	5	0	10	13	17	0	0	0
8	$14,001 to $16,000	50	0	0	0	0	3	4	1	6	14	6	17	0	0
9	$16,001 to $18,000	46	1	0	0	0	0	4	4	6	6	8	10	7	0
10	$18,001 to $20,000	25	1	0	0	0	0	0	5	4	3	2	2	9	0
11	$20,001 to $22,000	15	0	0	0	0	0	1	1	0	3	2	5	3	1
12	$22,001 to $24,000	10	0	0	0	0	0	2	3	1	1	1	0	3	0
13	$24,001 to $26,000	16	0	0	0	0	0	2	5	2	1	0	2	5	0
14	$26,001 to $28,000	18	0	0	0	0	1	0	9	1	1	2	0	4	0
15	$28,001 to $30,000	16	0	0	1	0	0	0	5	1	2	0	2	3	2
16	$30,001 to $32,000	7	0	0	0	0	0	0	3	0	0	1	1	2	0
17	$32,001 to $34,000	8	0	0	0	0	0	0	6	0	1	1	0	1	0
18	$34,001 to $36,000	6	0	0	0	0	0	0	2	0	0	1	1	1	1
19	$36,001 to $38,000	2	0	0	0	0	0	0	1	0	0	0	0	1	0
20	$38,001 to $40,000	5	0	0	0	0	0	0	4	0	0	0	0	0	2
21	$40,001 to $42,000	2	0	0	0	0	0	0	1	0	0	0	0	1	0
22	$42,001 to $44,000	2	0	0	0	0	0	0	2	0	0	0	0	1	0
23	$44,001 to $46,000	4	0	0	0	0	0	1	1	0	1	1	0	1	0
24	$46,001 to $48,000	3	0	0	0	0	0	3	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(EFC @46%) Sector: BUS. NON-DEGREE Independent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN --> $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	916	2	3	26	31	189	88	577	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	15	4	2	3	2	0	3	2	0	1	0	0	0	0
3	$ 4,001 to $ 6,000	15	1	1	0	0	2	4	2	1	1	3	1	0	0
4	$ 6,001 to $ 8,000	12	0	0	0	0	0	0	7	1	0	0	3	0	0
5	$ 8,001 to $10,000	5	0	0	0	0	0	0	2	0	0	0	2	0	0

(EFC @46%) Sector: OTHER Dependent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN --> $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	176	18	2	3	7	3	8	135	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	28	3	0	1	1	1	4	19	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	28	6	1	0	0	2	3	17	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	25	5	1	4	0	2	3	7	3	0	0	0	0	0
5	$ 8,001 to $10,000	23	3	0	0	4	1	3	0	12	1	0	0	0	0
6	$10,001 to $12,000	31	3	1	3	1	1	6	0	7	9	0	0	0	0
7	$12,001 to $14,000	25	5	1	0	1	0	3	0	5	4	7	0	0	0
8	$14,001 to $16,000	19	5	0	1	0	0	1	1	3	2	5	2	0	0
9	$16,001 to $18,000	29	6	0	0	0	0	0	0	4	8	4	4	3	0
10	$18,001 to $20,000	27	5	0	2	1	2	1	0	1	3	3	3	2	5
11	$20,001 to $22,000	24	4	1	0	1	0	3	1	2	3	2	4	1	5
12	$22,001 to $24,000	28	2	2	0	2	1	2	1	1	1	2	6	4	6
13	$24,001 to $26,000	21	1	1	0	1	0	0	1	1	2	3	3	2	6
14	$26,001 to $28,000	26	0	1	0	0	2	2	3	1	1	3	4	2	9
15	$28,001 to $30,000	21	0	0	0	1	0	1	0	1	2	1	5	3	9
16	$30,001 to $32,000	16	0	0	0	1	0	1	3	1	1	1	0	1	9
17	$32,001 to $34,000	14	0	0	0	0	0	0	1	0	1	1	1	1	10
18	$34,001 to $36,000	16	0	0	0	0	0	0	1	1	2	1	1	2	10
19	$36,001 to $38,000	17	0	0	0	1	0	1	2	1	2	4	1	2	4
20	$38,001 to $40,000	6	0	0	0	0	0	0	1	1	0	0	1	2	2
21	$40,001 to $42,000	4	0	0	0	0	1	0	1	0	0	0	0	0	2
22	$42,001 to $44,000	6	0	0	0	0	1	1	0	1	0	0	0	0	3
23	$44,001 to $46,000	5	0	0	0	0	1	0	1	1	0	0	0	0	2
24	$46,001 to $48,000	5	0	0	0	0	2	0	1	0	1	1	0	0	1
25	$48,001 to $50,000	5	0	0	0	0	2	0	0	0	0	0	0	0	4

(EFC @46%) Sector: OTHER Independent Students

Group	Income Range	FTE	<-- LOSS more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$2 to $200	NO CHANGE	GAIN --> $2 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	110	11	9	12	11	7	14	46	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	19	10	4	1	0	0	1	2	0	2	0	0	0	0
3	$ 4,001 to $ 6,000	16	3	4	3	1	1	1	1	0	1	1	1	0	0
4	$ 6,001 to $ 8,000	14	1	1	5	6	1	0	0	0	0	0	0	0	1
5	$ 8,001 to $10,000	5	0	0	0	0	0	4	0	1	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: CUNY SR Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,268	79	15	15	8	12	23	502	64	458	79	3	3	7
2	$ 2,001 to $ 4,000	80	10	2	2	1	1	2	9	9	34	8	3	0	1
3	$ 4,001 to $ 6,000	40	6	1	1	1	1	1	0	1	3	10	7	7	4
4	$ 6,001 to $ 8,000	38	6	2	1	1	1	0	0	1	1	0	0	2	24
5	$ 8,001 to $10,000	13	0	0	0	0	2	0	0	0	0	0	0	0	12
6	$10,001 to $12,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
7	$12,001 to $14,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
8	$14,001 to $16,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
9	$16,001 to $18,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
10	$18,001 to $20,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
11	$20,001 to $22,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
12	$22,001 to $24,000	1	0	0	0	0	0	0	0	0	0	1	0	0	1
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	1	0	0	0	0	0	0	0	0	1	0	0	0	0
15	$28,001 to $30,000	2	0	0	0	0	0	0	0	1	1	1	0	0	1
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	1	0	0	0	0	0	0	1	0	0	0	0	0	0
20	$38,001 to $40,000	1	0	0	0	0	0	0	0	0	1	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
26	$50,001 to $52,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1

(Use Federal Dependency & Conv. AGI) Sector: CUNY SR Independent Students (were NYS Dependent)

			<---------- LOSS							GAIN ---------->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	1,064	33	5	3	88	532	58	345	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	132	5	2	4	20	55	7	29	12	0	0	0	0	0
3	$ 4,001 to $ 6,000	121	15	8	2	9	46	8	25	4	5	0	0	0	0
4	$ 6,001 to $ 8,000	115	19	3	1	9	40	16	12	9	5	2	0	0	0
5	$ 8,001 to $10,000	87	17	4	1	1	6	31	0	21	0	6	0	0	0
6	$10,001 to $12,000	91	9	2	2	2	2	13	0	30	28	4	0	0	0
7	$12,001 to $14,000	80	9	1	1	1	2	3	0	18	30	18	0	0	0
8	$14,001 to $16,000	60	7	0	1	0	1	1	0	1	16	20	14	0	0
9	$16,001 to $18,000	51	4	0	0	1	0	3	0	1	1	11	23	8	0
10	$18,001 to $20,000	47	9	0	0	0	1	0	0	1	0	2	9	14	12
11	$20,001 to $22,000	40	6	0	0	0	1	3	0	1	0	1	0	6	24
12	$22,001 to $24,000	24	1	2	0	1	0	0	0	0	1	1	0	1	18
13	$24,001 to $26,000	17	1	0	0	0	1	1	0	0	0	1	1	1	13
14	$26,001 to $28,000	18	0	0	0	1	1	0	0	0	0	0	1	0	16
15	$28,001 to $30,000	21	0	0	1	0	2	1	0	1	0	0	1	0	17
16	$30,001 to $32,000	19	0	0	0	0	1	2	0	0	1	0	0	1	15
17	$32,001 to $34,000	13	0	0	0	0	0	0	0	0	1	0	0	1	12
18	$34,001 to $36,000	10	0	0	0	0	0	1	0	0	0	0	0	0	9
19	$36,001 to $38,000	14	0	0	0	0	3	0	0	0	0	0	0	1	11
20	$38,001 to $40,000	7	0	0	0	0	1	0	0	0	0	1	0	1	5
21	$40,001 to $42,000	6	0	0	0	0	1	0	0	0	0	0	0	0	5
22	$42,001 to $44,000	6	0	0	0	0	0	1	0	0	0	0	0	0	6
23	$44,001 to $46,000	4	0	0	0	0	1	1	0	0	0	1	0	0	1
24	$46,001 to $48,000	5	0	0	0	0	0	0	0	0	0	0	0	0	5
25	$48,001 to $50,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: CUNY CC Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,177	24	4	7	3	9	21	1105	0	1	0	0	1	4
2	$ 2,001 to $ 4,000	58	6	0	2	2	2	0	27	11	8	0	0	0	0
3	$ 4,001 to $ 6,000	30	1	0	1	0	2	0	0	0	4	9	9	5	0
4	$ 6,001 to $ 8,000	18	0	0	0	0	0	0	0	0	1	0	0	4	13
5	$ 8,001 to $10,000	6	0	0	0	0	0	0	1	0	0	0	0	0	6
6	$10,001 to $12,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
7	$12,001 to $14,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
9	$16,001 to $18,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	$18,001 to $20,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	1	0	0	0	0	0	0	0	0	1	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	$34,001 to $36,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: CUNY CC Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	766	12	1	2	1	2	10	737	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	70	1	1	1	3	1	6	58	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	63	5	2	0	0	3	3	51	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	59	7	2	1	0	1	0	25	25	0	0	0	0	0
5	$ 8,001 to $10,000	49	7	0	0	1	0	1	0	38	1	0	0	0	0
6	$10,001 to $12,000	43	8	0	1	1	0	1	0	1	32	0	0	0	0
7	$12,001 to $14,000	28	5	1	1	1	0	1	0	0	1	20	0	0	0
8	$14,001 to $16,000	32	1	1	1	0	1	0	1	0	0	1	26	0	0
9	$16,001 to $18,000	28	1	0	0	0	1	0	0	0	0	0	1	23	0
10	$18,001 to $20,000	24	2	1	0	1	0	0	0	0	0	0	1	4	15
11	$20,001 to $22,000	18	0	0	0	2	0	0	0	1	0	0	0	1	14
12	$22,001 to $24,000	20	0	0	2	1	1	0	0	0	0	1	0	1	15
13	$24,001 to $26,000	7	0	0	0	0	1	1	0	0	0	0	0	0	5
14	$26,001 to $28,000	18	0	0	0	0	1	1	0	0	0	0	0	0	16
15	$28,001 to $30,000	7	0	0	0	0	1	1	0	0	0	0	0	0	6
16	$30,001 to $32,000	6	0	0	0	0	1	0	0	0	0	0	0	0	5
17	$32,001 to $34,000	6	0	0	0	0	0	1	0	0	0	0	0	0	5
18	$34,001 to $36,000	2	0	0	0	0	1	0	0	0	0	0	0	0	1
19	$36,001 to $38,000	3	0	0	0	0	0	0	0	0	0	0	0	0	3
20	$38,001 to $40,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21	$40,001 to $42,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
22	$42,001 to $44,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
23	$44,001 to $46,000	3	0	0	0	0	0	0	0	0	0	0	0	0	3
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	2	0	0	0	0	0	0	0	1	0	0	0	0	1
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: SUNY SO Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,132	235	10	13	14	18	118	73	209	41	237	145	16	4
2	$ 2,001 to $ 4,000	105	36	3	2	1	2	7	1	19	8	11	11	4	1
3	$ 4,001 to $ 6,000	49	19	0	0	1	3	1	1	0	3	2	2	8	10
4	$ 6,001 to $ 8,000	31	6	1	1	2	0	1	0	0	0	0	2	1	18
5	$ 8,001 to $10,000	11	1	0	2	1	0	0	0	0	0	0	0	0	8
6	$10,001 to $12,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
9	$16,001 to $18,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	1	0	0	0	0	0	0	1	0	0	0	0	0	0
22	$42,001 to $44,000	1	0	0	0	0	0	0	1	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: SUNY SO Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	704	15	8	134	156	19	126	248	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	152	4	1	22	27	8	21	4	65	0	0	0	0	0
3	$ 4,001 to $ 6,000	125	6	2	18	17	4	28	3	15	33	0	0	0	0
4	$ 6,001 to $ 8,000	132	10	1	15	18	2	24	2	5	32	24	0	0	0
5	$ 8,001 to $10,000	129	12	0	1	24	11	8	3	18	3	48	0	0	0
6	$10,001 to $12,000	109	6	1	2	4	21	9	4	3	15	44	0	0	0
7	$12,001 to $14,000	83	6	2	1	1	1	19	3	7	7	37	0	0	0
8	$14,001 to $16,000	88	4	0	2	0	2	8	1	17	7	38	9	0	0
9	$16,001 to $18,000	90	8	0	0	1	0	5	1	6	18	38	8	6	0
10	$18,001 to $20,000	59	4	0	0	0	1	4	0	0	6	28	6	3	8
11	$20,001 to $22,000	42	6	0	0	0	1	0	0	2	1	3	9	11	10
12	$22,001 to $24,000	36	2	0	0	0	0	2	0	0	0	0	0	11	21
13	$24,001 to $26,000	32	2	0	0	0	0	1	0	0	0	1	1	1	27
14	$26,001 to $28,000	45	0	0	1	1	0	0	0	1	1	1	0	1	39
15	$28,001 to $30,000	42	0	2	0	0	0	0	0	0	0	0	1	0	39
16	$30,001 to $32,000	43	0	0	2	2	1	0	0	0	0	0	0	2	37
17	$32,001 to $34,000	39	0	0	0	0	0	0	0	1	0	1	1	0	37
18	$34,001 to $36,000	27	0	0	0	0	1	0	0	0	1	1	0	0	24
19	$36,001 to $38,000	19	0	0	0	0	1	1	0	0	0	0	0	0	18
20	$38,001 to $40,000	15	0	0	0	0	1	0	0	0	0	0	0	0	14
21	$40,001 to $42,000	19	0	0	0	0	1	0	0	0	0	0	0	0	18
22	$42,001 to $44,000	13	0	0	0	0	0	0	0	0	0	0	0	0	13
23	$44,001 to $46,000	8	0	0	0	0	0	0	0	0	0	0	0	0	8
24	$46,001 to $48,000	11	0	0	0	0	1	0	0	0	0	1	0	0	9
25	$48,001 to $50,000	5	0	0	0	0	0	0	0	0	0	0	0	0	5
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: SUNY CC Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,740	139	17	15	13	22	61	1462	1	2	2	1	4	4
2	$ 2,001 to $ 4,000	103	20	1	0	2	2	1	36	27	15	0	0	0	1
3	$ 4,001 to $ 6,000	71	10	1	1	0	2	1	0	2	6	21	18	10	1
4	$ 6,001 to $ 8,000	41	0	2	3	3	2	1	0	2	0	0	1	5	24
5	$ 8,001 to $10,000	12	0	0	0	0	0	1	0	0	1	1	1	1	8
6	$10,001 to $12,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
8	$14,001 to $16,000	1	0	0	0	0	0	0	0	0	0	0	0	1	0
9	$16,001 to $18,000	1	0	0	0	0	0	0	0	0	0	1	0	0	0
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	1	0	0	0	0	0	0	0	1	1	0	0	0	0
13	$24,001 to $26,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
14	$26,001 to $28,000	1	0	0	0	0	0	0	0	0	1	0	0	0	1
15	$28,001 to $30,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: SUNY CC Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	616	25	6	3	3	4	17	559	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	66	2	1	2	3	1	3	56	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	66	5	1	2	5	3	2	49	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	76	8	4	3	2	2	3	29	27	0	0	0	0	0
5	$ 8,001 to $10,000	50	10	2	1	2	0	2	0	33	1	0	0	0	0
6	$10,001 to $12,000	59	8	1	2	2	1	2	0	2	42	0	0	0	0
7	$12,001 to $14,000	44	10	1	1	0	0	1	0	1	1	30	0	0	0
8	$14,001 to $16,000	49	7	4	0	0	1	1	0	1	2	3	32	0	0
9	$16,001 to $18,000	48	1	1	1	1	0	1	0	0	1	1	7	35	0
10	$18,001 to $20,000	39	1	3	4	0	1	1	0	0	0	0	0	2	28
11	$20,001 to $22,000	25	0	0	1	2	1	2	0	1	0	0	0	1	19
12	$22,001 to $24,000	34	0	0	0	2	2	0	1	0	1	0	2	2	25
13	$24,001 to $26,000	30	0	0	0	0	1	1	1	0	0	0	2	0	25
14	$26,001 to $28,000	29	0	0	0	0	2	0	1	1	1	1	1	2	22
15	$28,001 to $30,000	32	0	0	0	0	1	0	1	0	2	0	2	1	26
16	$30,001 to $32,000	13	0	0	0	0	2	1	1	0	0	0	0	0	10
17	$32,001 to $34,000	20	0	0	0	0	2	2	0	0	1	0	0	0	15
18	$34,001 to $36,000	22	0	0	0	0	3	1	1	0	0	0	0	0	18
19	$36,001 to $38,000	13	0	0	0	0	2	0	0	1	0	0	0	1	11
20	$38,001 to $40,000	14	0	0	0	0	0	0	0	0	0	0	0	0	14
21	$40,001 to $42,000	9	0	0	0	0	1	0	1	0	0	0	0	0	8
22	$42,001 to $44,000	8	0	0	0	0	0	0	1	0	0	1	0	0	6
23	$44,001 to $46,000	8	0	0	0	0	0	0	0	1	0	0	0	0	7
24	$46,001 to $48,000	8	0	0	0	0	2	0	0	0	0	0	0	0	6
25	$48,001 to $50,000	3	0	0	0	0	0	0	0	0	0	0	0	0	3
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: INDEPENDENT Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,449	122	8	13	15	8	13	79	19	19	15	73	856	209
2	$ 2,001 to $ 4,000	120	21	1	1	1	2	5	0	4	3	12	3	30	39
3	$ 4,001 to $ 6,000	81	17	1	1	0	1	0	0	2	4	3	2	0	50
4	$ 6,001 to $ 8,000	51	9	1	3	0	1	0	0	0	1	0	0	1	36
5	$ 8,001 to $10,000	7	2	0	0	0	0	0	0	0	0	0	0	1	5
6	$10,001 to $12,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
7	$12,001 to $14,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
8	$14,001 to $16,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	$16,001 to $18,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	$18,001 to $20,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	1	0	0	0	0	0	0	0	1	0	0	0	0	0
20	$38,001 to $40,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: INDEPENDENT Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	1,287	280	525	13	13	5	4	446	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	222	41	67	3	8	5	4	0	93	0	0	0	0	0
3	$ 4,001 to $ 6,000	196	46	49	0	0	15	2	0	25	60	0	0	0	0
4	$ 6,001 to $ 8,000	238	58	54	1	0	3	14	0	1	70	37	0	0	0
5	$ 8,001 to $10,000	202	38	40	21	1	0	17	5	0	4	76	0	0	0
6	$10,001 to $12,000	188	28	16	40	13	0	15	7	2	3	65	0	0	0
7	$12,001 to $14,000	176	18	3	24	34	12	10	3	0	2	70	0	0	0
8	$14,001 to $16,000	149	14	0	1	16	30	19	2	0	2	66	0	0	0
9	$16,001 to $18,000	132	11	1	0	1	19	34	5	14	2	45	0	0	0
10	$18,001 to $20,000	109	9	1	2	0	1	28	0	40	15	14	0	0	0
11	$20,001 to $22,000	68	7	1	1	1	2	0	0	5	30	21	0	0	0
12	$22,001 to $24,000	47	10	0	1	0	0	1	0	2	3	21	10	1	0
13	$24,001 to $26,000	50	3	0	1	0	1	0	0	0	0	3	14	19	9
14	$26,001 to $28,000	61	13	1	0	2	2	0	0	1	0	0	1	15	26
15	$28,001 to $30,000	38	6	0	1	0	0	0	0	2	1	1	1	2	26
16	$30,001 to $32,000	39	4	2	0	1	0	1	0	0	0	1	0	2	28
17	$32,001 to $34,000	38	5	0	1	0	0	0	0	0	0	0	2	1	31
18	$34,001 to $36,000	28	0	5	0	0	0	0	0	0	1	1	0	1	20
19	$36,001 to $38,000	35	0	0	1	1	0	1	0	0	0	0	0	0	33
20	$38,001 to $40,000	25	0	0	0	1	2	1	0	0	0	0	1	0	20
21	$40,001 to $42,000	20	0	0	0	0	2	1	0	0	0	0	0	0	17
22	$42,001 to $44,000	20	0	0	0	0	1	0	0	0	0	0	3	0	16
23	$44,001 to $46,000	23	0	0	0	0	0	0	0	0	0	1	0	0	22
24	$46,001 to $48,000	14	0	0	0	0	1	0	0	0	0	0	1	0	13
25	$48,001 to $50,000	6	0	0	0	0	0	0	0	0	0	0	0	0	6
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: BUS. DEGREE Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	371	10	2	3	5	0	1	18	3	1	2	7	275	43
2	$ 2,001 to $ 4,000	25	2	0	0	0	0	0	1	1	0	0	1	12	8
3	$ 4,001 to $ 6,000	19	2	0	0	0	0	0	0	0	0	1	1	0	14
4	$ 6,001 to $ 8,000	17	2	0	0	0	0	1	0	0	0	0	1	1	13
5	$ 8,001 to $10,000	3	0	0	0	0	0	0	0	0	0	0	0	0	3
6	$10,001 to $12,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	$16,001 to $18,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: BUS. DEGREE Independent Students (were NYS Dependent)

			<---------- LOSS						GAIN ---------->					
Group	Income Range	FTE	more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	$1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001
1	$ 0 to $ 2,000	574	127	419	3	1	4	1	19	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	49	17	31	0	1	0	1	0	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	54	26	26	1	1	0	0	0	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	39	21	16	0	0	0	0	1	1	0	0	0	0	0
5	$ 8,001 to $10,000	29	6	11	12	0	0	1	0	0	0	0	0	0	0
6	$10,001 to $12,000	30	8	4	14	6	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	39	11	1	5	16	5	0	0	0	0	1	0	0	0
8	$14,001 to $16,000	33	12	0	0	3	12	6	0	0	0	0	0	0	0
9	$16,001 to $18,000	34	15	0	1	0	6	8	1	3	0	0	0	0	0
10	$18,001 to $20,000	22	5	0	0	0	1	4	0	8	4	0	0	0	0
11	$20,001 to $22,000	15	6	0	0	0	0	1	0	2	4	1	0	0	0
12	$22,001 to $24,000	17	1	1	0	0	0	1	0	0	1	5	6	1	1
13	$24,001 to $26,000	18	3	0	0	1	2	0	1	0	0	0	2	5	3
14	$26,001 to $28,000	19	3	0	1	1	0	0	0	0	1	0	1	4	9
15	$28,001 to $30,000	12	2	0	1	0	0	0	0	0	0	0	0	0	9
16	$30,001 to $32,000	8	0	1	0	0	0	0	0	0	1	1	0	0	5
17	$32,001 to $34,000	15	2	1	0	0	0	0	0	0	0	0	0	0	12
18	$34,001 to $36,000	11	0	2	0	0	0	0	0	0	1	0	1	0	7
19	$36,001 to $38,000	11	0	0	0	1	0	0	0	1	0	0	0	0	8
20	$38,001 to $40,000	6	0	0	0	1	0	0	0	0	0	0	1	0	4
21	$40,001 to $42,000	5	0	0	0	0	1	0	0	0	0	0	0	1	3
22	$42,001 to $44,000	4	0	0	0	0	0	0	0	0	0	0	0	0	4
23	$44,001 to $46,000	3	0	0	0	0	1	0	0	0	0	0	0	0	2
24	$46,001 to $48,000	4	0	0	0	0	2	0	0	0	0	0	0	0	2
25	$48,001 to $50,000	2	0	0	0	0	1	0	0	0	0	0	0	0	1
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: BUS. NON-DEGREE Dependent Students (were NYS Independent)

Group	Income Range	FTE	<-- LOSS: more than $1001	$801 to $1000	$601 to $800	$401 to $600	$201 to $400	$1 to $200	NO CHANGE	GAIN: $1 to $200	$201 to $400	$401 to $600	$601 to $800	$801 to $1000	more than $1001 -->
1	$ 0 to $ 2,000	158	0	0	1	0	0	1	3	124	1	0	0	25	4
2	$ 2,001 to $ 4,000	5	0	0	0	0	0	0	0	2	2	1	0	0	0
3	$ 4,001 to $ 6,000	4	0	0	0	0	0	0	0	0	0	0	3	1	0
4	$ 6,001 to $ 8,000	2	0	0	0	0	0	0	0	0	0	0	0	2	0
5	$ 8,001 to $10,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	$10,001 to $12,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	$16,001 to $18,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: BUS. NON-DEGREE Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	177	2	27	4	2	14	126	2	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	12	0	1	2	0	2	7	0	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	8	1	2	0	0	2	4	0	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	3	0	0	0	1	0	2	0	0	0	0	0	0	0
5	$ 8,001 to $10,000	4	0	0	0	1	0	3	0	0	0	0	0	0	0
6	$10,001 to $12,000	3	0	0	1	0	0	0	0	3	0	0	0	0	0
7	$12,001 to $14,000	5	0	0	0	0	0	0	0	0	5	0	0	0	0
8	$14,001 to $16,000	5	0	0	0	0	0	0	0	0	0	5	0	0	0
9	$16,001 to $18,000	4	0	0	0	0	0	0	0	0	0	2	3	0	0
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	3	0	0	0	0	0	0	0	0	0	0	3	0	0
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	1	0	0	0	0	0	0	0	0	0	0	1	0	0
14	$26,001 to $28,000	3	0	0	0	0	0	0	0	0	0	2	2	0	0
15	$28,001 to $30,000	3	0	0	0	0	0	0	0	0	0	1	3	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	0	0	1	0	0	0
18	$34,001 to $36,000	2	0	0	0	0	0	0	0	0	0	0	2	0	0
19	$36,001 to $38,000	1	0	0	0	0	0	0	0	0	0	1	0	0	0
20	$38,001 to $40,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	2	0	0	0	0	0	0	0	0	0	0	2	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: OTHER Dependent Students (were NYS Independent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	25	3	0	0	1	1	1	3	1	2	1	3	0	2
2	$ 2,001 to $ 4,000	2	1	0	0	0	0	0	0	0	0	1	0	0	1
3	$ 4,001 to $ 6,000	3	1	0	0	0	0	0	0	0	0	0	0	1	2
4	$ 6,001 to $ 8,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
5	$ 8,001 to $10,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	$10,001 to $12,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	$12,001 to $14,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	$16,001 to $18,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	$18,001 to $20,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	$20,001 to $22,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	$22,001 to $24,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	$28,001 to $30,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	$30,001 to $32,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	$32,001 to $34,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	$34,001 to $36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	$36,001 to $38,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(Use Federal Dependency & Conv. AGI) Sector: OTHER Independent Students (were NYS Dependent)

Group	Income Range	FTE	LOSS more than $1001	LOSS $801 to $1000	LOSS $601 to $800	LOSS $401 to $600	LOSS $201 to $400	LOSS $1 to $200	NO CHANGE	GAIN $1 to $200	GAIN $201 to $400	GAIN $401 to $600	GAIN $601 to $800	GAIN $801 to $1000	GAIN more than $1001
1	$ 0 to $ 2,000	14	5	4	0	1	1	0	4	0	0	0	0	0	0
2	$ 2,001 to $ 4,000	3	1	1	0	0	1	0	1	0	0	0	0	0	0
3	$ 4,001 to $ 6,000	4	2	1	0	1	0	0	1	0	0	0	0	0	0
4	$ 6,001 to $ 8,000	7	3	2	0	2	0	0	0	0	0	0	0	0	0
5	$ 8,001 to $10,000	3	2	0	0	0	0	0	0	0	0	0	0	0	0
6	$10,001 to $12,000	2	0	0	0	1	0	0	0	0	1	0	0	0	0
7	$12,001 to $14,000	2	0	0	1	0	1	0	0	0	0	0	0	0	0
8	$14,001 to $16,000	3	1	1	0	1	0	1	0	1	0	0	0	0	0
9	$16,001 to $18,000	1	0	0	0	0	0	0	0	0	0	0	1	0	0
10	$18,001 to $20,000	3	1	0	0	1	0	0	0	1	1	0	0	0	0
11	$20,001 to $22,000	2	0	0	0	0	0	0	0	0	0	1	0	0	1
12	$22,001 to $24,000	1	0	0	0	0	0	0	0	0	0	1	0	0	0
13	$24,001 to $26,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	$26,001 to $28,000	2	0	0	0	1	0	0	0	1	0	0	0	0	1
15	$28,001 to $30,000	4	0	0	1	0	0	0	0	0	0	0	0	0	3
16	$30,001 to $32,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
17	$32,001 to $34,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
18	$34,001 to $36,000	2	0	0	0	0	0	0	0	0	0	0	0	0	2
19	$36,001 to $38,000	2	0	0	1	2	0	0	0	0	0	0	0	0	0
20	$38,001 to $40,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	$40,001 to $42,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	$42,001 to $44,000	2	0	0	0	0	1	0	0	0	0	0	0	0	1
23	$44,001 to $46,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	$46,001 to $48,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	$48,001 to $50,000	1	0	0	0	0	0	0	0	0	0	0	0	0	1
26	$50,001 to $52,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The City University of New York
535 East Eightieth Street
New York, New York 10021

The Chancellor

MEMORANDUM

July 5, 1996

TO: President Robert Maurer

FROM: W. Ann Reynolds

RE: Proposals to Restructuring of the New York State Tuition Program (TAP)

We have reviewed the documents distributed by your office regarding proposals to restructure the Tuition Assistance Program (TAP). Please find attached our response for discussion purposes.

The first part, entitled "Another Side of the Public Policy for the Tuition Assistance Program" addresses the four questions emanating from materials prepared by your office. The second part, "Restructuring TAP: A Closer Look at Implications to CUNY" examines the potential outcome and impact of the proposals.

We welcome the opportunity to discuss both the proposals and our response in greater detail.

I have asked Dean Bill Proto and Mr. George Chin to be available, should you have any questions or wish additional information.

Encl.

CC: Cabinet
Dean Bill Proto
Mr. George Chin
Eileen Kouyoumjian

WAR:kc

Another Side of the Public Policy for the Tuition Assistance Program

Several questions are raised in the HESC documents about the structure and nature of TAP:

1. Can New York continue to ignore student aid that is available from federal and other sources and not take these funds into consideration in the TAP program?

2. Was it intended that the distribution of TAP expenditures should shift to public sectors where maximum awards continue to cover 90% of tuition and away from private colleges where maximum awards covered a significantly decreased percentage of tuition (30%)?

3. What reasonable expectation was there that students should complete a program and graduate after receiving significant support to do so?

4. Was there a simpler and more equitable way of determining need and distributing TAP funds among students?

Background

The 1996-97 Executive Budget proposed to change TAP beyond the reductions enacted for 1995-96. The changes enacted for 1995-96 were done in statute in contrast to actions taken between the 1991 and 1995 to temporarily modify award schedules.

The 1995-96 changes to the permanent program statute reduced program expenditures by:

- reducing the tuition coverage from 100% for low income undergraduate students at public colleges to 90%

- reducing the maximum award for undergraduate students at independent colleges by $225 from the previously authorized maximum award of $4,125

- reducing the maximum awards significantly, to $1,200, for students at non-degree institutions

- reducing the maximum award for graduate students from $1,200 to $550
- reducing aid eligibility for students requiring extensive remedial coursework
- limiting aid to six semesters for students pursuing associate degrees
- modifying the income reduction schedules used to calculate TAP awards.

These changes had the effect of reducing the budget baseline projections for TAP from $755.7 million to $635.4 million for the 1995-96 year, thus reducing TAP expenditures by $120.3 million.

The 1996-97 Executive Budget included the following changes:

- limiting the combination of one-half of a student's Pell Grant award and the TAP award to 90% of tuition (100% for those with zero income)
- freezing the tuition basis for TAP award calculations to the 1995-96 tuition level
- using AGI rather than NTI to determine awards with a reduction in the maximum income level for eligibility
- a $20 million block grant was proposed for the public college.
- providing for mid year reductions to control expenditures to the initial appropriation
- establishment of a "C" average requirement for TAP eligibility.

The fiscal changes would diminish TAP baseline expenditures from $649 million (using the 1995-96 rules) to $512 million ($507 million from state funds and $5.4 million from federal funds), creating a reduction of $137 million. For the two year period, the reduction in student aid would have been $237 million.

Question 1: Consideration of Other Aid Sources

New York State should take into account the availability of student aid from other sources, the actual cost of college attendance to the student and/or families, and the special importance of maintaining Federal Pell Grants to defray total educational costs regardless of tuition levels. Given the increased costs associated with attending college, and the financial difficulties faced by low-income students, any review of potential aid sources should recognize that Pell Grants have not kept pace with inflation and cost of living measurements. We support the policy inherent in the authorizing statute associated with the 1992 Higher Education amendment, which removes the percentage cost of education restrictions, promoting the use of Pell Grants to cover the total costs of education

Question 2: Shift in Distribution of TAP Expenditures

The establishment of TAP took place prior to the imposition of tuition at CUNY and subsequent tuition increases at both CUNY and SUNY over the past twenty years. As you know, these increases have substantially shifted the balance of tax levy support and tuition within the public sector. Therefore, TAP must take into account the greater burden placed on students at CUNY and SUNY. TAP was essentially built on two components; (1) to provide for tuition access for students, and (2) to provide a tuition equalization component, thereby allowing student choice to attend independent institutions. A review of the various components of the program shows variation of the equalization component through the years, with a range from the current low of 24% of SUNY tuition to a high of 162% of SUNY tuition. (Please refer to Table 3.) However, most frequent occurrences of the equalization amount center around 100% of SUNY tuition. This suggests that the TAP maximum should be raised, perhaps to an amount as high as $5,000, so that adequate tuition equalization can be realized and, therefore, college choice could be insured.

There has been a significant effort to change the access component of TAP by reducing TAP awards for students in the public sector. This effort to reduce expenditures and to increase the equalization amount for choice relative to TAP awards at public institutions is the wrong approach to changing TAP. Rather than meeting its intent of protecting access for students, it instead reduces, access and choice. This kind of proposal can only result in reduced educational attainment by New York State students.

Even in the context of sector shares, Table 1 illustrates that over 20 years, the shares have not varied significantly. Almost all of the shifts can be attributed to either TAP enrichment or public tuition increases. In years where public sector tuition has increased, the public sector shares obviously increase, thereby insuring access, as mandated by the program purpose.

Over the long term, TAP enrichments and the cycle of public sector tuition increases have tended to keep the shares relatively proportional to the 1976-77 shares. However, in years of TAP enrichment, the independent sector share clearly increases. If one compares the total shared by the independent colleges and "other", the percentage of TAP expenditures (47%) slightly exceeds that same reported in 1976-77.

Another factor influencing the declining portion of independent sector tuition covered by the maximum TAP award is, in fact, an issue of inflation: the level of tuition increases become substantially higher than the rate of inflation and the rate of growth in TAP. Since 1976, the CPI-U for the New York and Northern New Jersey area has increased by about 166%. The current TAP maximum of $3,900 is approximately 160% higher than the $1,500 maximum in 1976. However, the increase in the weighted average independent sector tuition has been 370%. It is this disparity in growth rates which has reduced the efficacy of TAP in covering tuition at the independent sector institutions. While the general inflation rate for the period has been about 5.4%, the rate of increase for independent sector tuition has been about 8.5%. Tuition increases in the independent sector are uncontrolled.

HESC has stated that TAP covers 30% of the average tuition cost in the independent sector. This average cost is defined at $13,300 -- an amount which is dramatically higher than that which would have been attained if the actual CPI inflation rate for this geographic region had been followed: the average tuition then, as outlined in Table 2, would be $7,702, with the maximum TAP award covering 51% of tuition cost.

Question 3: Expectation of Graduation

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Every effort should be made to maximize graduation rates, consistent with and greater than national norms. Financial aid, tuition levels, student support services, better high school preparation, work/study opportunities and other assistance and strategies should be considered as universities measure outcomes relating to retention and graduation. The March 1996 report , **Leaving CUNY: Destinations of Students Who Depart from the University**, addressed, among other issues, the long held belief that many "drop-

outs" were actually transfers. A survey of the freshmen class that entered CUNY in the fall 1990 was launched. This report examined specifically the progress of those student (totaling 6,507) who began college as full time students in bachelor degree programs and who were admitted through regular admissions procedures. By spring 1995, about 44% or 2,872 students, had left the CUNY system without a degree.

These leavers were followed up through a mail questionnaire. The results emphasize the ongoing pursuit of success among these "drop-out". First, **almost 50% of these students transfer to non-CUNY colleges**, thereby negating the term "drop-out". 72% of the leavers did so with an earned GPA of 2.00 or better. Interestingly enough, the transfer option was not limited to only those leavers in good standing. Close to 40% of those who left CUNY with less than a 2.00 average did transfer, suggesting that while they were not doing well enough to complete CUNY, their records were acceptable to other institutions.

As educators and public officers, our definition of success needs to be expanded and defined in broader terms than in program completion at the initial college. The focus must include the critical importance of college study. The real question for analysis is what the "added value" is to society for the education received.

Question 4: Equity in Determination of Need\Distribution of TAP

The system of determining awards using state income has been questioned for a number of years. Issues questioned include a call for more administrative simplicity, and for equity in awards. The New York State Education Department issued a report in 1974 which indicated that state income was as good a predictor of parental support for education as federal gross income. The report also stated that the value of assets beyond home equity was not a very significant factor; assets had little correlation with income and, thus, use of an inflator to income was not appropriate to predict contribution form assets.

However, there is growing support for a system which would use either elements for the federal process or the outcome from the federal process to determine whether it provides equity to students. This approach needs significant analysis to determine whether it provides equity to students.

The issue of defining equity is further complicated by who establishes the formulas used for eligibility: is Congress cognizant of and committed to the intent of TAP? When tuition was imposed at CUNY in 1976,

the New York State legislature indicated that TAP would be the safety net for low income students. Finally, with a re-authorization on the horizon, changes in the federal methodology can have significant impact on the cost of the state program.

A factor that should be evaluated in the context of restructuring TAP should be a more complex look at the access and choice components of the current program. It is constructed to reduce awards generally by income but the tuition equalization component is held relatively constant for students in broad income range. It may be fruitful to consider adjusting the equalization component as a function of income.

A more equitable approach (although undesirable given the importance of maintaining TAP support) to achieving TAP savings could result from the following formula: establish the student's maximum award, using cost of education allowances; then reduce all awards across the board, regardless of the college sector of attendance.

In this challenging and demanding fiscal climate, the burden of savings must be recognized, while access id preserved for all opportunities of higher education within the state. The prime purpose of TAP -- providing a continuing safety net for low income students -- must remain the foundation and guidepost in any restructuring actions.

Table 1

Sector Shares of Undergraduate TAP Expenditures

Year	Undergraduate TAP Expenditures	CUNY Share	SUNY Share	Ind. Share	Other Share
73-74	44.6	0.67%	55.16%	41.48%	2.69%
74-75	72.2	0.55%	48.48%	46.40%	4.57%
75-76	102.3	0.49%	36.69%	51.22%	8.60%
76-77	173.2	27.02%	25.40%	39.95%	7.62%
80-81	244.9	20.29%	21.76%	46.67%	11.27%
85-86	355.5	15.95%	21.35%	43.54%	19.16%
90-91	424.0	13.21%	20.28%	47.12%	19.39%
91-92	501.1	16.62%	21.99%	44.22%	17.16%
92-93	588.8	20.64%	25.31%	39.35%	14.71%
93-94	595.4	22.10%	26.27%	38.11%	13.52%
94-95	623.6	22.35%	26.22%	38.17%	13.26%
95-96 Est.	631.0	25.94%	27.18%	35.29%	11.58%

Table 2

Projected Weighted NY Independent Sector Tuition

Year	7.2% Inflation	5.5% Inflation	8.5% Inflation	NY-NE NJ CPI-U* Inflation	NY-NE NJ CPI U Rate
76-77	$2,889	$2,889	$2,889	$2,889	5.8%
77-78	$3,097	$3,048	$3,135	$3,039	5.2%
78-79	$3,320	$3,216	$3,401	$3,212	5.7%
79-80	$3,559	$3,392	$3,690	$3,492	8.7%
80-81	$3,815	$3,579	$4,004	$3,887	11.3%
81-82	$4,090	$3,776	$4,344	$4,267	9.8%
82-83	$4,384	$3,983	$4,713	$4,515	5.8%
83-84	$4,700	$4,203	$5,114	$4,727	4.7%
84-85	$5,039	$4,434	$5,549	$4,963	5.0%
85-86	$5,401	$4,678	$6,020	$5,147	3.7%
86-87	$5,790	$4,935	$6,532	$5,317	3.3%
87-88	$6,207	$5,206	$7,087	$5,583	5.0%
88-89	$6,654	$5,493	$7,690	$5,856	4.9%
89-90	$7,133	$5,795	$8,343	$6,179	5.5%
90-91	$7,647	$6,113	$9,052	$6,555	6.1%
91-92	$8,197	$6,450	$9,822	$6,850	4.5%
92-93	$8,787	$6,804	$10,657	$7,097	3.6%
93-94	$9,420	$7,179	$11,563	$7,310	3.0%
94-95	$10,098	$7,573	$12,545	$7,515	2.8%
95-96	$10,826	$7,990	$13,612	$7,702	2.5%

* Consumer Price Index rates are used for this geographic region as this data is more reflective of inflation impact than national rates.

Table 3

Historical Comparison of TAP Max & Public Sector Tuition

Year	SUNY Tuition	CUNY Tuition	TAP Max	TAP max At SUNY	Tuition Equalization Amt	MAX SUNY Tuit	EQU Amt SUNY Tuit
73-74	$650	$0	$600	$600	$0	92%	0%
74-75	$750	$0	$1,500	$750	$750	200%	100%
75-76	$750	$0	$1,500	$750	$750	200%	100%
76-77	$750	$775	$1,500	$750	$750	200%	100%
77-78	$750	$925	$1,800	$750	$1,050	240%	140%
78-79	$750	$925	$1,800	$750	$1,050	240%	140%
79-80	$925	$925	$1,800	$925	$875	195%	95%
80-81	$925	$1,075	$1,800	$925	$875	195%	95%
81-82	$1,075	$1,200	$2,200	$1,075	$1,125	205%	105%
82-83	$1,375	$1,250	$2,200	$1,375	$825	160%	60%
83-84	$1,375	$1,250	$2,200	$1,375	$825	160%	60%
84-85	$1,375	$1,250	$2,700	$1,375	$1,325	196%	96%
85-86	$1,375	$1,250	$2,700	$1,375	$1,325	196%	96%
86-87	$1,375	$1,250	$2,850	$1,375	$1,475	207%	107%
87-88	$1,375	$1,250	$2,850	$1,375	$1,475	207%	107%
88-89	$1,375	$1,250	$2,850	$1,375	$1,475	207%	107%
89-90	$1,375	$1,250	$3,650	$1,375	$2,275	265%	165%
90-91	$1,575	$1,450	$4,125	$1,575	$2,550	262%	162%
91-92	$2,175	$1,850	$4,050	$2,100	$1,950	186%	90%
92-93	$2,675	$2,450	$3,575	$2,600	$975	134%	36%
93-94	$2,675	$2,450	$3,575	$2,600	$975	134%	36%
94-95	$2,675	$2,450	$4,050	$2,600	$1,450	151%	54%
95-96	$3,425	$3,200	$3,900	$3,085	$815	114%	24%

Office of Student Financial Assistance

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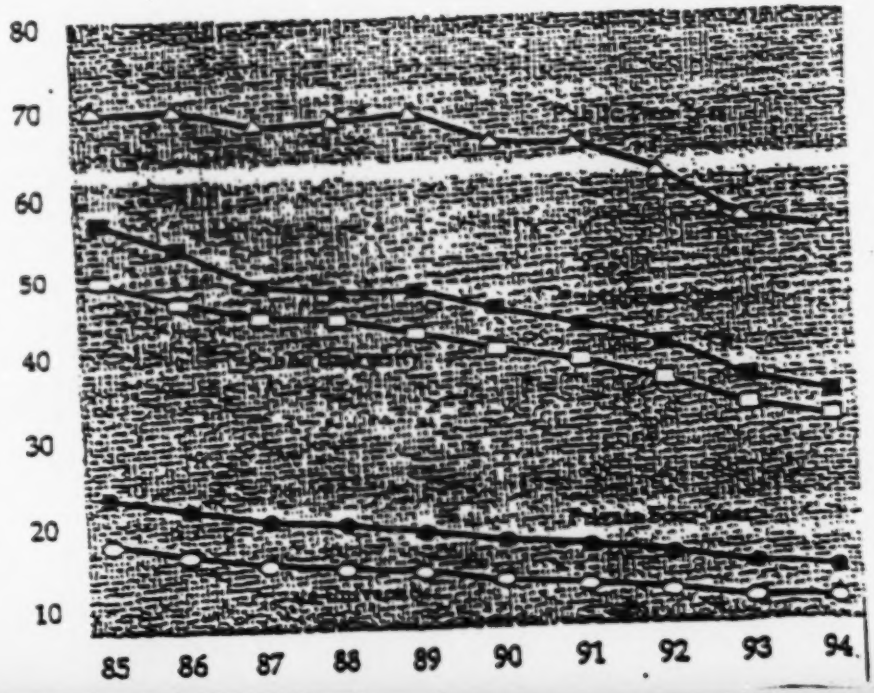
TABLE 4

Description of Federal Pell Grant Awards from 1973–74 to 1994–95

Year	Authorized Maximum Awards		Actual Maximum Awards		Actual Minimum Awards		Percent Cap on Costs	Percent of Recipients Independent
	Current Dollars	Constant Dollars	Current Dollars	Constant Dollars	Current Dollars	Constant Dollars		
1973–74	1,400	4,342	452	1,402	50	176	50	13.3
1974–75	1,400	3,907	1,050	2,930	50	140	50	21.9
1975–76	1,400	3,649	1,400	3,649	200	521	50	29.8
1976–77	1,400	3,447	1,400	3,447	200	492	50	38.3
1977–78	1,800	4,154	1,400	3,231	200	462	50	38.5
1978–79	1,800	3,798	1,600	3,376	50	106	50	36.7
1979–80	1,800	3,352	1,800	3,352	200	372	50	33.8
1980–81	1,800	3,083	1,750	2,997	150	257	50	40.6
1981–82	1,900	2,995	1,670	2,633	120	189	50	41.9
1982–83	2,100	3,175	1,800	2,721	50	76	50	45.9
1983–84	2,300	3,354	1,800	2,625	200	292	50	47.5
1984–85	2,500	3,508	1,900	2,666	200	281	50	48.6
1985–86	2,600	3,546	2,100	2,864	200	273	60	50.4
1986–87	2,600	3,468	2,100	2,801	100	133	60	53.9
1987–88	2,300	2,946	2,100	2,690	200	256	60	57.5
1988–89	2,500	3,062	2,200	2,695	200	245	60	57.9
1989–90	2,700	3,154	2,300	2,687	200	234	60	59.0
1990–91	2,900	3,221	2,300	2,547	100	111	60	61.1
1991–92	3,100	3,325	2,400	2,575	200	215	60	61.5
1992–93	3,100	3,225	2,400	2,497	200	208	60	62.1
1993–94	3,700	3,752	2,300	2,332	400	406	—	59.2
1994–95	3,900	3,845	2,300	2,268	400	394	—	N.A.
95-96	[illegible]		[illegible]		[illegible]			
96-97	4300		[illegible]		[illegible]			

FIGURE 3
The Maximum Pell Grant as a Share of Cost of Attendance



Notes to Figure 3
Based on Tables 3 and 7.
Academic Year 85 = 1985–86.

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RESTRUCTURING TAP
A Closer Look at Implications to CUNY

The proposal to restructure the Tuition Assistance Program (TAP) attempts to fold in a number of policy approaches that have been discussed widely over the last decade at the federal and state level. These approaches to student aid focus on targeting of funds to needy students, effective use of funds, equity of distribution of funds, and administrative efficiency.

However, the current proposal distorts the concepts by incorporating them into a restructuring of TAP. Rather than clearly defining TAP's policy goals and the population to be served and then starting with a "clean sheet" of paper to design a program; this proposal already seems to have been constrained and driven by state financial concerns and other unstated, but evident, policy objectives such as a redistribution of funds to students at higher cost institutions. It would be preferable to define the policy goals clearly and to have a program structure which is scaleable to accommodate finances while maintaining an adherence to the stated policy priorities.

DETERMINING TAP AWARDS

Presented in this document is an examination of many features defined in the proposed TAP restructuring. The executive budget proposes to offset TAP with one-half of a student's Pell Grant. In response to this proposal, the financial aid community in New York suggested that should Pell Grants be considered in the equation for determining eligibility for TAP awards, then the full cost of attendance (not just tuition cost) should be used in the eligibility process. The current proposal superficially uses the cost of attendance concept but constricts the definition both in terms of the cost elements and the magnitude of the value of certain cost elements. This results in a cost of attendance figure that is not reflective of the actual cost of attendance for students.

This understatement of costs is particularly egregious in the case of independent students, where an appropriate level of costs for room and board is not reflected. The problem of understating costs for the students is compounded by an award determination process which uses less than 100% of the reduced values and then tiers the percentage downward as a student progresses through the academic program. In a well defined program, the costs used as part of the award determination process should reflect actual costs.

The following tables illustrates the differences in the cost of attendance proposed and the actual cost of attendance used for federal student aid programs at CUNY.

Senior Colleges

	Proposed Cost	Actual Dependent	Actual Independent
Tuition	3,200	3,200	3,200
Fees	150	120	120
Room & Board	1,500	1,500	4,893
Lunch	0	855	855
Books	600	500	500
Transportation	800	810	810
Miscellaneous	0	1,359	2,442
TOTAL	6,250	8,344	12,820

Community Colleges

	Proposed Cost	Actual Dependent	Actual Independent
Tuition	2,500	2,500	2,500
Fees	150	100	100
Room & Board	1,500	1,500	4,893
Lunch	0	855	855
Books	600	500	500
Transportation	800	810	810
Miscellaneous	0	1,359	2,442
TOTAL	5,550	7,624	12,100

This reduced cost of attendance, along with the misapplication of the concept of frontloading of grant aid, hurts students attending those institutions which primarily provide access to higher education by significantly reducing the aggregate amount of grant aid received during enrollment in the academic program.

The proposal makes an attempt to implement a concept of frontloading grant aid to students but effectively defines frontloading as providing less grant aid in the later years of a student's academic career. The broader national discussions about a policy of "frontloading" grant aid have focused on

providing more grant aid during the early part of a student's academic career, thereby reducing later reliance on loans as part of the financing package.

The combination of unrealistic costs of attendance and the subsequent use of only 90% of that lower basis for calculating initial year grants still forces students to look toward student loans to pay for their costs of attendance. In this proposal the concept of frontloading is just policy dressing to rationalize a tiering down of awards as the student progress through the academic program. The following tables illustrate the need for students to borrow under the terms of the proposal compared to current award rules.

Senior College Award Comparison

	Year 1	Year 2	Year 3	Year 4
Proposed Costs	6,250	6,250	6,250	6,250
Pell	2,470	2,470	2,470	2,470
Proposed TAP	3,155	2,530	1,905	1,280
Dependent Student				
Actual Cost	8,344	8,344	8,344	8,344
Pell	2,470	2,470	2,470	2,470
Proposed TAP	3,155	2,530	1,905	1,280
Remaining Need	2,719	3,344	3,969	4,594
Max. Subsidized Loan	2,625	3,344	3,969	4,594
Actual Cost	8,344	8,344	8,344	8,344
Pell	2,470	2,470	2,470	2,470
Current TAP	2,880	2,880	2,680	2,680
Remaining Need	2,994	2,994	3,194	3,194
Max. Subsidized Loan	2,625	2,994	3,194	3,194
Independent Student				
Actual Cost	12,820	12,820	12,820	12,820
Pell	2,470	2,470	2,470	2,470
Proposed TAP	3,155	2,530	1,905	1,280
Remaining Need	7,195	7,820	8,445	9,070
Max. Subsidized Loan	2,625	3,500	5,500	5,500
Actual Cost	12,820	12,820	12,820	12,820
Pell	2,470	2,470	2,470	2,470
Current TAP	2,880	2,880	2,680	2,680
Remaining Need	7,470	7,470	7,670	7,670
Max. Subsidized Loan	2,625	3,500	5,500	5,500

Community College Award Comparison

	Year 1	Year 2	Year 3
Proposed Costs	5,550	5,550	5,550
Pell	2,470	2,470	2,470
Proposed TAP	2,525	1,970	1,415
Dependent Student			
Actual Cost	7,624	7,624	7,624
Pell	2,470	2,470	2,470
Proposed TAP	2,525	1,970	1,415
Remaining Need	2,629	3,184	3,739
Max. Subsidized Loan	2,625	3,184	3,500
Actual Cost	7,624	7,624	7,624
Pell	2,470	2,470	2,470
Current TAP	2,250	2,250	2,050
Remaining Need	2,904	2,904	3,104
Max. Subsidized Loan	2,625	2,904	3,104
Independent Student			
Actual Cost	12,100	12,100	12,100
Pell	2,470	2,470	2,470
Proposed TAP	3,155	2,530	1,905
Remaining Need	6,475	7,030	7,585
Max. Subsidized Loan	2,625	3,500	3,500
Actual Cost	12,100	12,100	12,100
Pell	2,470	2,470	2,470
Current TAP	2,880	2,880	2,680
Remaining Need	6,750	6,750	6,950
Max. Subsidized Loan	2,625	3,500	3,500

Clearly, the proposal for restructuring TAP will result in greater potential aggregate borrowing for dependent students and increased aggregate need gap for independent students during their undergraduate experience.

MERIT BASED SCHOLARSHIPS

The rationalization of the use of merit awards as an additional application of the frontloading concept is inappropriate; most students who qualify for merit awards tend to be from higher income families. Basing the receipt of the award on the receipt of a Regents high school diploma, therefore, directs the expenditure of funds to students who live in wealthier school districts. It also discriminates against students from high schools which either do not have the ability or simply do not offer Regents high school diplomas. The indicated goal of using these one time scholarships to encourage attendance in New York institutions is somewhat spurious in that the proposed amount of $200 for the award is not large enough to be a significant factor in influencing student decisions regarding choice of college attendance.

GRADUATION INCENTIVES TO STUDENT AND INSTITUTION

The attempt to build in graduation incentives into the program is a misguided approach to student aid. The proposal pays for these incentives by significantly reducing student awards during the later stages of enrollment. The reduction in awards would be paid out to the student in the form of a post graduation grant or as a loan forgiveness award, creating another misapplication of programmatic concepts. The reduction of the grants during a student's academic career may actually cause the student to either not to complete the degree or to delay completing the degree in order to accommodate financing patterns. As illustrated in prior charts, the loss of these funds as grants during the period of enrollment only forces students to consider loans to replace the reduction in grants; in some cases, use of loans would not adequately allow the student meet the full cost of attendance.

Further, the value of the award as a loan forgiveness element is diluted by the discounting of the loan proceeds by origination and guarantee fees. Thus, the awarding of the funds as a grant during the enrollment period is a more effective and valuable use of the funds and allows for use of the full value, rather than repaying the face value of a loan discounted at the time of disbursement.

The requirement of completion of a four year program within period no more than five years as a condition for the graduation incentive, works against older students. These students tend to take a lighter load, even when attending full-time, to accommodate other family and/or work responsibilities and would be handicapped by the reduced financial support in the later years of the program.

This time constrained completion requirement also negatively impacts students who transfer from community colleges to four year colleges in that full credit for the work at the community college is not always allowed for the baccalaureate degree.

Further, the use of a flat incentive amount tends to disproportionately reward those who have a higher probability of completion within five years due to, in part, their better pre-collegiate preparation in higher income school districts.

The design of this incentive program appears to be also fundamentally flawed in terms of student equity as it is available to all students, not only those facing a progressive reduction of TAP awards during their pursuit of a bachelor's degree. As such, the incentive can be viewed as a vehicle primarily for enrichment of benefits to students at higher cost institutions.

The inclusion of institutional incentives into a student aid program is entirely inappropriate. As designed, this incentive would superficially appear to reward schools for poor students who graduate. In reality, however, it might produce a higher education mirror of the inequalities already inherent in elementary and secondary school financing in that currently successful and well funded schools will tend to receive a disproportionate amount of the funding while other institutions, such as community colleges, would not receive the adequate funding needed to provide those services that enhance student success.

While the reference to maximum TAP recipients provides some correlation with students preparedness, access institutions would receive less funding initially than highly selective institutions which will more than likely gain in funding for students who were already likely to complete degree programs. It would be more equitable to provide FTE financing for these services based on institutional student profiles so that the funds are targeted specifically to institutions needing greater services. If the initial funding is adequate, incentive payments or performance payments can be made for subsequent improvements in completion rates. If the intent is to support opportunity programs and services to students, the approach should be more direct and less cumbersome by separately the appropriations of funds from student aid provisions.

NEW YORK STATE COLLEGE WORK STUDY

The inclusion of a state work study program is an admirable idea, but it should mirror the federal program so that schools do not have to set up a separate set of administrative procedures to implement the program. The differences in matching rates will cause schools to have to differentiate between students in the two programs develop duplicate tracking systems. Further, the higher matching rate at some schools, which charge back the employing department, will create a problem in placement of students. It may be more efficient for the State to provide funding which will allow schools to overmatch the federal program, thereby creating greater administrative ease in the management of a single program with an increased wage pool.

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A STUDENT BILL OF RIGHTS
As Included In
The Keppel Report, 1973

Opportunities shall be guaranteed to New York State high school graduates for up to two years of post-secondary education throughout their lifetime. They shall be available to those students who seek further post-secondary education and who qualify for admission and continued study according to institutional standards. The State shall insure that the necessary facilities and programs are available.

The Bill of Rights shall further guarantee that:

1. Students from low-income families shall receive support in the form of outright grants, loans and work, adequate to cover all reasonable actual expenses of attendance at public and private post-secondary institutions.[1] In the case of students from very low-income families, extra allowances shall be made for unusual personal expenses. Outright grants should cover approximately two-thirds of actual, reasonable expenses during the first two years at all institutions. Outright grants should cover the cost of all tuition, fees, reasonable expenses of room and board or the cost of commuting during the first two years at all public institutions. The financial support needed to cover additional expenses should be provided by subsidized loans and student work. Grants for the third, fourth and, in come cases, the fifth year shall cover declining percentages of actual expenses. In all cases, grants for low-income students would cover full tuition and fees at public institutions, and the total of grants, loans and work would be sufficient to cover the costs of attending private institutions.

2. Students from middle-income families shall receive grants which, when added to a required level of family support, shall cover approximately two-thirds of actual costs of attendance during the first two years. Grants

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[1] Defined as including tuition, fees, books, room and board, commuting costs and an allowance for personal expenses.

will be based on declining percentages of costs in the third and subsequent years. The remainder shall be provided by subsidized student loans and work.

3. Students from families whose income level makes them ineligible for grants should be eligible to receive support from subsidized student loans and work. The level of this support, however, is contingent on the family's ability to pay, diminishing to zero at the point where the family can defray a student's entire educational expenses.

4. Families shall be guaranteed loans without subsidized interest in order to finance part of their required level of support. Those families which do not receive benefits under articles 1 through 3 above shall be entitled to loans without a means test.